

1 E. MARTIN ESTRADA
United States Attorney
2 MACK E. JENKINS
Assistant United States Attorney
3 Chief, Criminal Division
JENA A. MACCABE (Cal. Bar No. 316637)
4 KEVIN J. BUTLER (Cal. Bar No. 329129)
Assistant United States Attorneys
5 Violent and Organized Crime Section
1300 United States Courthouse
6 312 North Spring Street
Los Angeles, California 90012
7 Telephone: (213) 894-5046/6495
Facsimile: (213) 894-0141
8 E-mail: jena.maccabe@usdoj.gov
kevin.butler2@usdoj.gov
9

10 Attorneys for Plaintiff
UNITED STATES OF AMERICA
11

12 UNITED STATES DISTRICT COURT

13 FOR THE CENTRAL DISTRICT OF CALIFORNIA

14 UNITED STATES OF AMERICA,

15 Plaintiff,

16 v.

17 DAEKUN CHO,
aka "DK,"

18 Defendant.
19
20

No. CR 23-00149-FMO

GOVERNMENT'S OPPOSITION TO
DEFENDANT DAEKUN CHO'S APPLICATION
FOR REVIEW/RECONSIDERATION OF
ORDER OF DETENTION; DECLARATION OF
JENA A. MACCABE; EXHIBITS

21 Plaintiff United States of America, by and through its counsel
22 of record, the United States Attorney for the Central District of
23 California and Assistant United States Attorneys Jena A. MacCabe and
24 Kevin J. Butler, hereby files its opposition to defendant DAEKUN
25 CHO's application for review/reconsideration of order of detention.

26 //

27 //
28

1 This opposition is based upon the attached memorandum of points
2 and authorities, the declaration of Jena A. MacCabe and exhibits
3 thereto, the files and records in this case, and such further
4 evidence and argument as the Court may permit.

5 Dated: July 31, 2023

Respectfully submitted,

6 E. MARTIN ESTRADA
7 United States Attorney

8 MACK E. JENKINS
9 Assistant United States Attorney
 Chief, Criminal Division

10 /s/

11 JENA A. MACCABE
12 KEVIN J. BUTLER
 Assistant United States Attorneys

13 Attorneys for Plaintiff
14 UNITED STATES OF AMERICA
15
16
17
18
19
20
21
22
23
24
25
26
27
28

TABLE OF CONTENTS

<u>DESCRIPTION</u>	<u>PAGE</u>
MEMORANDUM OF POINTS AND AUTHORITIES.....	1
I. INTRODUCTION.....	1
II. BACKGROUND.....	2
A. Defendant Extorted Two Business Owners from 2019 through 2021 and Beat and Carjacked One of Them.....	2
B. For Approximately Four Years, Defendant Extorted Another Victim, Whom Defendant Physically Assaulted This Year.....	4
C. Defendant Is Suspected of Committing a Shooting, a Kidnapping, and Other Beatings Last Year.....	6
D. When Investigators Came to Arrest Defendant, He Tried to Flee, and Investigators Found Weapons and Physical Evidence Corroborating the Victims' Statements about His Crimes.....	7
E. The Court Detained Defendant Pending Trial.....	8
F. Feeling Safe with Defendant in Custody, Additional Victims Contacted Authorities about Defendant's Crimes....	9
G. Defendant's Victims Fear His Release.....	10
H. Defendant's Criminal History.....	10
III. DISCUSSION.....	11
A. Legal Standards for Pretrial Detention.....	11
B. Defendant Is a Risk of Danger and Non-Appearance.....	12
1. Nature and Circumstances of the Offenses.....	12
2. Weight of the Evidence.....	14
3. History and Characteristics of Defendant.....	16
4. Nature and Seriousness of the Danger Posed by Defendant's Release.....	18
IV. CONCLUSION.....	20

TABLE OF AUTHORITIES

<u>DESCRIPTION</u>	<u>PAGE</u>
Cases	
<u>United States v. Aslanian,</u> No. 22-50300, 2022 WL 18046468 (9th Cir. Dec. 30, 2022)	14
<u>United States v. Barone,</u> 387 F. App'x 88 (2d Cir. 2010)	15, 16
<u>United States v. Calabrese,</u> 436 F. Supp. 2d 925 (N.D. Ill. 2006)	14
<u>United States v. Canady,</u> No. 1:07-CR-45, 2007 WL 9753227 (E.D. Tex. Mar. 8, 2007)	13
<u>United States v. Colombo,</u> 777 F.2d 96 (2d Cir. 1985)	18
<u>United States v. Diaz-Hernandez,</u> 943 F.3d 1196 (9th Cir. 2019)	11, 12
<u>United States v. Ferranti,</u> 66 F.3d 540 (2d Cir. 1995)	17
<u>United States v. Gebro,</u> 948 F.2d 1118 (9th Cir. 1991)	11
<u>United States v. Hir,</u> 517 F.3d 1081 (9th Cir. 2008)	18, 19
<u>United States v. Honeyman,</u> 470 F.2d 473 (9th Cir. 1972)	14
<u>United States v. Knuckles,</u> No. 22-CR-20129, 2022 WL 2115994 (E.D. Mich. June 13, 2022)	13
<u>United States v. Motamedi,</u> 767 F.2d 1403 (9th Cir. 1985)	11
<u>United States v. Petrov,</u> 604 F. App'x 66 (2d Cir. 2015)	19
<u>United States v. Townsend,</u> 897 F.2d 989 (9th Cir. 1990)	17
<u>United States v. Wedington,</u> No. RDB-19-597, 2020 WL 4569524 (D. Md. Aug. 7, 2020)	13
<u>United States v. Winsor,</u> 785 F.2d 755 (9th Cir. 1986)	12

TABLE OF AUTHORITIES (CONTINUED)

<u>DESCRIPTION</u>	<u>PAGE</u>
<u>United States v. Zhang,</u> 55 F.4th 141 (2d Cir. 2022)	14, 16
Statutes	
18 U.S.C. § 1951.....	12, 17
18 U.S.C. § 2119(2).....	12, 17
18 U.S.C. § 3142.....	11, 12, 14
18 U.S.C. § 3143(c).....	20
18 U.S.C. § 3771(a) (4).....	10
California Penal Code § 135.....	11
California Penal Code § 664.....	11
California Penal Code § 25850(a).....	10
California Penal Code § 27545.....	11
Rules	
Fed. R. Crim. P. 60(a) (3).....	10

MEMORANDUM OF POINTS AND AUTHORITIES

I. INTRODUCTION

For years, defendant DAEKUN CHO, also known as "DK," ("defendant") has been extorting businesses and individuals in the Koreatown area of Los Angeles. Specifically, defendant charges karaoke bars and doumi¹ drivers a monthly "protection fee" (or unlawful debt). If the bar operators or drivers do not pay, defendant commits acts of violence against those individuals. Or defendant will ban drivers from servicing -- or financially penalize drivers who service -- karaoke bars that refuse to pay defendant. Since karaoke bars rely on the availability of doumis for their businesses to survive, they would comply with defendant's demands.

To further his extortion scheme, defendant committed a shooting, a carjacking, a kidnapping, and other acts of physical violence. Defendant made explicit threatening statements to the doumi drivers and karaoke bar owners to force them to pay a monthly fee. Many of those acts and demands are captured on audio or video recordings, and in text messages, laying defendant's violent scheme bare.

For this conduct, defendant is charged with 32 counts of extortion, one count of attempted extortion, and one count of carjacking. At his initial appearance, defendant was detained pending trial. He then applied for reconsideration of the detention order based on the identification of sureties with real property with \$500,000 of equity, which was denied based on "the facts of [d]efendant's violent conduct (as explained in the original criminal complaint[] [that] have been augmented by convincing proof of

¹ "Doumi" is a colloquial word for a hostess/companion that gets paid by the patron of the karaoke bar to accompany them.

1 possession of serious weaponry and additional information regarding
2 [d]efendant's conduct at the time of his arrest." (Dkt. 28.)

3 Defendant now appeals to this Court, which should deny
4 defendant's application because there are no conditions or
5 combination of conditions that will reasonably assure the appearance
6 of defendant and the safety of any person or the community.

7 **II. BACKGROUND**

8 **A. Defendant Extorted Two Business Owners from 2019 through** 9 **2021 and Beat and Carjacked One of Them**

10 In July 2019, defendant approached Y.S. -- who, along with his
11 business partner J.L. operated a doumi driving company -- while Y.S.
12 was dropping off doumis at the parking lot for a karaoke bar.

13 (Compl. ¶ 25, Dkt. 1.) Defendant told Y.S. that if he and J.L.
14 wanted to continue to do business, they must start paying defendant
15 protection fees. (Id.) Of course, the only person that Y.S. and
16 J.L. needed protection from was defendant. Y.S. and J.L. paid
17 defendant around the 15th of every month. (Id. ¶ 26.) Law
18 enforcement obtained Venmo records showing extortion payments from
19 Y.S. and J.L. to defendant. (Decl. of Jena A. MacCabe ("MacCabe
20 Decl.") ¶ 2; Ex. 1 (samples of Venmo payments).)²

21 Y.S. and J.L., like another victim driver ("S.S.") and others,
22 also shared texts from an unknown number, which they understood to be
23 defendant based on the context of the messaging group they were in
24 and history of defendant sending such messages, dictating what bars
25 they could visit. (Compare Ex. 2 (texts from "unknown"), with Ex. 3
26 (texts from "DK").) In one conversation provided by a confidential
27

28 ² All exhibits listed in this opposition are exhibits to the
attached declaration of Jena A. MacCabe.

1 source, defendant tells the doumi drivers which karaoke bars they
2 were prohibited from servicing and then says, "Anyone try[,] Ur car
3 gonna get fucckedup with u in it . . . [.] Any bitch ass rat go
4 there. I'ma fuckin kill u." (Ex. 4.) In another conversation, when
5 Y.S. told defendant he was not going to certain karaoke bars,
6 defendant responded, "Just remember wherever u work theres gonna be
7 pay issues . . . [.] Hope ur smart enough." (Ex. 5.)

8 In 2021, defendant told Y.S. that he was raising the
9 "protection" prices, but Y.S. refused to pay the price increase.
10 (Compl. ¶ 27.) As corroboration, Y.S. provided dash camera footage
11 from Y.S.'s car on April 21, 2021, where defendant says, "I need my
12 money," and asks, "Did you call cops?" (Ex. 6.) In response to
13 Y.S.'s lack of payment, on May 8, 2021, defendant and his accomplice
14 pulled Y.S. out of Y.S.'s vehicle and assaulted Y.S. with baseball
15 bats. (Compl. ¶ 27.) Defendant told his accomplice to "fuck him
16 up." (Id.) Defendant and his accomplice broke Y.S.'s left arm and
17 caused him to need stitches for a laceration to his lower left leg.
18 (Id.) They also inflicted multiple lacerations, abrasions, and
19 bruising on Y.S.'s legs and hips. (Id.) During the attack, Y.S. was
20 screaming and yelling, "I will pay! I will pay!" (Id. ¶ 30.) After
21 attacking Y.S., defendant stole Y.S.'s car. (Id. ¶ 31.)

22 The entirety of defendant's attack on Y.S. was captured on CCTV
23 footage from the karaoke bar and was provided to law enforcement.
24 (Id. ¶ 33; Ex. 7-8.) Y.S. stated that defendant was wearing a mask
25 with skeleton graphic during the attack, but Y.S. was able to
26 identify defendant by the top half his visible face and his voice, as
27 well as the content of the communication. (Compl. ¶ 28.) Shortly
28 after the attack, defendant posted a photograph of himself on

1 Instagram wearing the same skeleton mask. (Id.) When defendant was
 2 arrested, law enforcement found matching skeleton masks at
 3 defendant's house. (Compare Ex. 9 (defendant's Instagram post,
 4 lightened below for visibility), with Ex. 10 (photograph of masks
 5 seized from defendant's house).)



6
 7
 8
 9
 10
 11
 12
 13
 14
 15 Following Y.S.'s beating, in July 2021, Y.S. and J.L. began
 16 receiving threatening messages from an unknown number whom they
 17 believe to be defendant. (Compl. ¶ 35.) Those messages addressed
 18 the victims' family members, home addresses, and vehicle
 19 identification numbers. (Id.) The messages read, "I know where you
 20 live" and "see u." (Id.)

21 After defendant's attack on Y.S., and after receiving the
 22 threatening messages, Y.S. and J.L. closed their business. (Id.
 23 ¶ 37.) J.L. also fled to another state with his family. (Id. ¶ 35.)

24 **B. For Approximately Four Years, Defendant Extorted Another**
 25 **Victim, Whom Defendant Physically Assaulted This Year**

26 For approximately four years, S.S., another doumi driver, paid
 27 defendant a monthly extortion fee. (Compl. ¶ 48.) Law enforcement
 28 obtained Venmo records that show these payments beginning in 2020

1 when defendant began accepting electronic payments due to the
2 pandemic. (See MacCabe Decl. ¶ 11; Ex. 11 (samples of Venmo
3 payments).) After S.S. decided to stop paying, on January 24, 2023,
4 defendant texted someone asking where S.S. lives. (Ex. 24.) Later
5 that night, defendant approached S.S., who was sitting in his car,
6 and physically assaulted him. (Compl. ¶¶ 48-49.) Before and during
7 the assault, defendant asked S.S. if he wanted to die and told him,
8 “[I]f you ignore more text messages, next time, I’m gonna kill you.”
9 (Ex. 12.) Defendant also stole approximately \$1,000 from him.
10 (Compl. ¶ 49.) Defendant even texted someone that night, “I got
11 [S.S.] haaha,” and the next day, in “Ktown[,] I socked his ass.”
12 (Ex. 23; see also Ex. 24 (“I found him and socked him.”).)

13 The following day, S.S. started paying defendant again out of
14 fear for his safety. (Compl. ¶ 50.) Defendant had sent previous
15 messages referencing his attack of Y.S. (above) as a means of
16 coercion to get the companies to comply. (See id.)

17 On February 14, 2023, defendant messaged S.S. to collect that
18 month’s extortion payment. (Id. ¶ 52.) Two days later, law
19 enforcement set up an operation to surveil the interaction. (Id.
20 ¶ 54.) That night, defendant messaged S.S. to meet him in a parking
21 garage for a karaoke bar. (Id. ¶ 58.) Law enforcement officers set
22 up surveillance in the parking garage and were spotted. (Id. ¶ 60.)
23 Defendant then messaged S.S. asking if S.S. had called the police.
24 (Id.)

25 Defendant next changed the location for the meeting two times.
26 (Id. ¶¶ 61-62.) Law enforcement also spotted him driving by and
27 making a U-turn, conducting countersurveillance, before telling S.S.
28 to pay an intermediary instead, which S.S. did. (Id. ¶¶ 62-65, 67.)

C. Defendant Is Suspected of Committing a Shooting, a Kidnapping, and Other Beatings Last Year

Not only has defendant bragged about beating and carjacking Y.S. (Compl. ¶¶ 39, 50), but he also said that he kidnapped another doumi driver to “send a signal” to the company (id. ¶ 40).

Additionally, on July 15, 2022, defendant was involved in a shooting near a karaoke parking lot. (Id. ¶ 41.) At approximately 1:30 a.m., a victim pulled into the lot to drop off two doumis when defendant, who was wearing a mask covering the lower portion of his face, approached them. (Id. ¶ 42.) Defendant opened the door to the car and came halfway inside. (Id. ¶ 43.) Defendant appeared to have something in his waistband and told the driver that his company was not allowed to drop off doumis at that location and they had to leave. (Id.) Defendant then departed, and once the doumis got back into the car, all three individuals departed the parking lot as well. (Id.) As soon as the car pulled onto the street, the driver heard gunshots and glass breaking in the car. (Id.) He looked back and saw that one doumi was bleeding from a gunshot wound to the neck. (Id.) The incident was captured on surveillance video, and defendant can be seen leaning into the car as described. (Ex. 13 (first video clip).) Once the car drives away, defendant is no longer in focus, but bystanders can be seen taking cover after being startled by the discharge of a firearm. (Ex. 14 (second video clip).) Cell-site data also places one of defendant’s phones in the area at the time of the shooting. (Ex. 15 (pertinent cell-site records highlighted in yellow).) This incident is currently under investigation by the Los Angeles Police Department. (Compl. ¶ 43.)

1 Finally, on the evening of September 17, 2022, D.E. was parked
2 at a karaoke bar when defendant opened his door and asked, "What
3 company do you work for?" (Id. ¶¶ 45-46.) Defendant then punched
4 D.E. in the face, and D.E. fled the location in his car. (Id. ¶ 46.)
5 D.E. went to the hospital and was treated for injuries to the left
6 side of his face because of defendant. (Id. ¶ 45.)

7 **D. When Investigators Came to Arrest Defendant, He Tried to**
8 **Flee, and Investigators Found Weapons and Physical Evidence**
9 **Corroborating the Victims' Statements about His Crimes**

10 On March 16, 2023, defendant was arrested on the charges in this
11 case, and search warrants were executed at defendant's home. (Ex.
12 16.) When law enforcement announced their presence, defendant
13 attempted to escape through multiple windows. (See id.) In the
14 latter room, law enforcement found a fully loaded firearm with the
15 safety disengaged. (Id.)

16 Inside defendant's home, law enforcement found a 9mm firearm, a
17 Glock 17 caliber firearm, a partially built ghost gun, multiple
18 loaded, high-capacity magazines, and ammunition for a pistol (no such
19 pistol was recovered). (Ex. 17.) Law enforcement also found the
20 aforementioned skull masks like defendant wore when he beat Y.S., a
21 black beanie that defendant photographed himself wearing with the
22 skull mask, two baseball bats, \$20,733 in cash and a Motorola phone
23 hidden underneath the sink. (See id.) Inside defendant's Mercedes
24 Benz, law enforcement found two knives, one of which is illegal to
25 possess. (See id.)

26 //

27 //

Below is a photograph of some of the items seized (Ex. 10):



E. The Court Detained Defendant Pending Trial

Defendant is charged with 32 counts of extortion, one count of attempted extortion, and one count of carjacking. (Indictment, Dkt. 14.) On March 16, 2023, defendant made his initial appearance. (Dkt. 7.) He declined to be interviewed by Pretrial Services and submitted on detention.

On April 26, 2023, defendant filed an application for review/reconsideration of his detention. (Dkt. 19.) Magistrate Judge Michael R. Wilner denied that request for reconsideration on May 8, 2023. (Dkt. 28.) Judge Wilner held that “[t]he government adequately showed by clear and convincing evidence that the Court cannot set conditions of release that would reasonably assure the safety of the community.” (*Id.*) Judge Wilner continued:

I recognize the significance of the pledge of a secured bond from Defendant’s relatives. However, **the facts of Defendant’s violent conduct (as explained in the original criminal complaint have been augmented by convincing proof of possession of serious weaponry and additional information regarding Defendant’s conduct at the time of his arrest.** Taken together, the Court has little confidence that it could plausibly set conditions of release that would (a) protect the community and (b) be honored by Defendant during the pendency of the case.

(*Id.* (emphasis added).)

1 Defendant then filed the instant application on May 17, 2023.
2 (Dkt. 30.) Defendant proposes the same bond from sureties, namely,
3 relatives in this District, with real property with \$500,000 of
4 equity. (Dkt. 19.)

5 **F. Feeling Safe with Defendant in Custody, Additional Victims**
6 **Contacted Authorities about Defendant's Crimes**

7 On July 18, 2023, a karaoke bar worker told investigators that
8 defendant had threatened him "many times." (Ex. 18.) He also said
9 that approximately five or six years ago, defendant showed up to a
10 karaoke bar one night after it was closed and demanded that the
11 manager open the store, pointing a pistol at the manager's head.
12 (Id.) In approximately December 2020, when the victim started
13 working at a karaoke bar, defendant contacted the victim and told him
14 that he needed to pay defendant approximately \$1,000 per month, but
15 reduced it to \$500 per month when the victim said that he did not
16 have that kind of money. (Id.) Defendant told the victim, "[I]f you
17 don't pay[,] something will happen to you guys -- business-wise and
18 to them too." (Id.) Approximately one to two years ago, defendant
19 told the victim to shut off the surveillance cameras at his karaoke
20 bar or, "I'll find you and kill you," because defendant told the
21 victim that defendant had a "personal thing" with someone at the
22 karaoke bar and that something might happen. (Id.) The victim said
23 that about a year ago, defendant also hit a doumi driver he hated and
24 assaulted a karaoke worker who let that driver come to the karaoke
25 bar. (Id.)

26 On July 18, 2023, another doumi driver told law enforcement that
27 when he started working as a driver, he had to pay defendant a \$1,500
28 start-up/set-up fee to enter the business. (Ex. 19.) Defendant then

1 charged the victim \$200 a month before increasing the price to \$400 a
2 month. (Id.) Defendant also would ban certain karaoke bars from
3 having doumis, restricting drivers from going to those bars. (Id.)
4 If a driver violated the ban, defendant would threaten them and
5 charge a penalty fee of approximately \$200. (Id.) Defendant would
6 even patrol karaoke bars to ensure that his victims were complying.
7 (Id.) One time, the victim heard defendant threaten to kill a
8 karaoke worker "if you ever call those [banned doumi driving]
9 companies again." (Id.)

10 **G. Defendant's Victims Fear His Release**

11 J.L. and S.S. submitted written statements pleading for
12 defendant's continued detention for their safety. J.L. explains that
13 he has "done everything that [he] was asked for and ha[s] gone above
14 and beyond to try to stay safe and help authorities. If [defendant]
15 bails out, he would try to find [J.L.] and [J.L.'s] family. The last
16 three years have been very tough mentally and physically." (Ex. 20.)
17 S.S. explains that defendant's name is S.S.'s trauma, and if
18 defendant is released, S.S. will not be able to maintain his life in
19 Los Angeles. (Ex. 21.)³ Y.S. and J.L. also intend to assert their
20 right to be reasonably heard at the bail hearing. See 18 U.S.C.
21 § 3771(a)(4); see also Fed. R. Crim. P. 60(a)(3).

22 **H. Defendant's Criminal History**

23 On November 17, 2021, defendant was sentenced to 18 months of
24 diversion for two counts of carrying a loaded firearm in violation of
25 California Penal Code § 25850(a), one count of criminal firearm sales
26

27
28 ³ The government asks that the Court read past any grammatical errors in S.S.'s written submission because English is not S.S.'s first language.

1 in violation of California Penal Code § 27545, and one count of
 2 attempting to destroy evidence in violation of California Penal Code
 3 §§ 135, 664. (Ex. 22 at 3.) He was thus serving a diversion
 4 sentence while committing many of the crimes he is now charged with.

5 **III. DISCUSSION**

6 Defendant's application for reconsideration of pretrial
 7 detention should be denied because he is a danger to the community
 8 and a risk of non-appearance.

9 **A. Legal Standards for Pretrial Detention**

10 A defendant must be detained pending trial where "no condition
 11 or combination of conditions will reasonably assure the appearance of
 12 the person as required and the safety of any other person and the
 13 community." 18 U.S.C. § 3142(e)(1). Detention is thus appropriate
 14 where a defendant is either a danger to the community or a flight
 15 risk; it is not necessary to prove both. United States v. Motamedi,
 16 767 F.2d 1403, 1406 (9th Cir. 1985). "[T]he government bears the
 17 burden of showing by a preponderance of the evidence that the
 18 defendant poses a flight risk, and by clear and convincing evidence
 19 that the defendant poses a danger to the community." United States
 20 v. Gebro, 948 F.2d 1118, 1121 (9th Cir. 1991) (citing Motamedi, 767
 21 F.2d at 1406-07).

22 Categorical grants or denials of bail, untethered from an
 23 individualized determination, are impermissible. United States v.
 24 Diaz-Hernandez, 943 F.3d 1196, 1199 (9th Cir. 2019). That is because
 25 "the Bail Reform Act mandates an individualized evaluation guided by
 26 the factors articulated in § 3142(g)." Id. Those factors are:

- 27 (1) the nature and circumstances of the offense charged;
- 28 (2) the weight of the evidence against the defendant;

- (3) the defendant's character, physical and mental condition, family and community ties, past conduct, history relating to drug or alcohol abuse, criminal history; and
- (4) the nature and seriousness of the danger to any person or to the community that would be posed by the defendant's release. 18 U.S.C. § 3142(g).

United States v. Winsor, 785 F.2d 755, 757 (9th Cir. 1986) (per curiam) (citation omitted). Consideration of non-statutory factors is disfavored. Diaz-Hernandez, 943 F.3d at 1199.

Pursuant to 18 U.S.C. § 3142(f)(2), a detention hearing may be reopened "if the judicial officer finds that information exists that was not known to the movant at the time of the hearing and that has a material bearing on the issue whether there are conditions of release that will reasonably assure the appearance of such person as required and the safety of any other person and the community."

B. Defendant Is a Risk of Danger and Non-Appearance

For years, defendant has been endangering victims in Koreatown and has tried to evade detection. When he was arrested in this case, he further demonstrated his risk of danger and non-appearance.

1. Nature and Circumstances of the Offenses

The nature and circumstances of defendant's offenses unequivocally weigh in favor of detention.

Defendant faces a statutory maximum of 20 years for each of the 33 extortion and attempted extortion counts, see 18 U.S.C. § 1951, and 25 years for the carjacking count, see 18 U.S.C. § 2119(2). That sentencing exposure reflects the seriousness of defendant's offenses. And pretrial detention for such charges is common. See, e.g., United States v. Ricks, No. 8:23-cr-00094-MEMF, Dkt. 16 (C.D. Cal. June 29, 2023) (denying bond for carjacker who, like defendant, was not armed

1 with a firearm and, unlike defendant, did not even physically harm
2 the victim); United States v. Knuckles, No. 22-CR-20129, 2022 WL
3 2115994, at *2 (E.D. Mich. June 13, 2022) (denying bond for armed
4 carjacker); United States v. Wedington, No. RDB-19-597, 2020 WL
5 4569524, at *3 (D. Md. Aug. 7, 2020) (same); United States v. Canady,
6 No. 1:07-CR-45, 2007 WL 9753227, at *3 (E.D. Tex. Mar. 8, 2007)
7 (same, even when not applying the rebuttable presumption in favor of
8 detention).

9 Moreover, defendant's specific conduct in this case is alarming.
10 As merely one example, after extorting two business owners in
11 Koreatown for over a year, defendant demanded higher payments. After
12 one of the business owners refused, defendant asked that victim if he
13 had called the cops. Later, defendant and his accomplice pulled him
14 from his car and assaulted him with baseball bats. Defendant told
15 his accomplice to "fuck [the victim] up." They broke the victim's
16 left arm and caused him to need stitches for a laceration to his
17 lower left leg. They also inflicted multiple lacerations, abrasions,
18 and bruising on his legs and hips. They violently attacked the
19 victim while he yelled, "I will pay! I will pay!" They then stole
20 the victim's car.

21 In February of this year, while trying to collect an extortion
22 payment from a victim whom defendant had physically assaulted and
23 stolen \$1,000 from the previous month, defendant showed his concern
24 about law enforcement detection. Specifically, defendant asked the
25 victim whether he had called the police on defendant, engaged in
26 countersurveillance in driving around and changing the meeting
27 location, and ultimately instructed the victim to use an intermediary
28 to make the extortion payment.

1 In sum, the nature and circumstances of defendant's offenses
2 demonstrate that he is a risk of both danger and non-appearance.

3 2. Weight of the Evidence⁴

4 The evidence that defendant committed the charged offenses is
5 overwhelming and cannot be ignored in assessing defendant's risk of
6 danger and non-appearance in this case. See, e.g., United States v.
7 Aslanian, No. 22-50300, 2022 WL 18046468, at *1 (9th Cir. Dec. 30,
8 2022) ("Given the nature of the crime and the **strength of the**
9 **government's case**, we find that the government has met its burden of
10 showing, by clear and convincing evidence, that 'no condition or
11 combination of conditions will reasonably assure . . . the safety of
12 . . . the community.'" (emphasis added)).

13 In addition to the multiple victims who have recounted
14 defendant's crimes against them and other witnesses' statements, law
15 enforcement has video of defendant committing these crimes. (See,
16 e.g., Compl. ¶ 33 (discussing video of carjacking); Ex. 7-8
17

18 ⁴ Nothing in the text endorses assigning relative weights to the
19 statutory factors, 18 U.S.C. § 3142(g), and this Court should not do
20 so. The statement that the strength of the evidence is deserving of
21 the "least weight" originated with United States v. Honeyman, 470
22 F.2d 473, 474 (9th Cir. 1972), but only in the context of applying
23 the factors to that specific case. While one factor might outweigh
24 others in a particular case, it is inappropriate to treat one factor
25 as categorically less important. See United States v. Zhang, 55
26 F.4th 141, 149 (2d Cir. 2022) ("[T]he weight given to each factor
27 will inevitably vary from case to case."). Indeed, various courts
28 have questions and criticized the creation of a hierarchy of factors.
See, e.g., United States v. Calabrese, 436 F. Supp. 2d 925, 927 (N.D.
Ill. 2006) (finding that "[s]ubsequent Ninth Circuit opinions seized
on [one case's] language but without discussing the justification for
favoring one," "[t]he statute does not instruct that one or another
factor is less important," "it is difficult to see how this factor
could always be less important than others," "were there very strong
evidence that a defendant was a serial rapist or killer, this factor
alone might outweigh all other[s]," and that the principle is an
"off-key but well-intentioned attempt to remind us of the rule that
detention is not to ordered simply because we are convinced that the
accused is guilty.").

1 (carjacking videos); Ex. 6 (dash camera footage of defendant).) Law
2 enforcement further has: messages that defendant sent to his victims
3 (Compl. ¶¶ 35, 67); skeleton masks seized from defendant's house like
4 the mask that defendant wore to attack a victim (id. ¶ 33; Ex. 10
5 (photograph of items seized from defendant's property); see also
6 Compl. ¶ 42 (another victim reported that defendant wore a mask
7 during a shooting incident)); photographs corresponding with injuries
8 that defendant inflicted on one of his victims (Compl. ¶ 33); cell-
9 site data corresponding with defendant's movements including during
10 his attempted extortion (id. ¶¶ 56-57, 59, 61-63, 66); and records of
11 the extortion payments (Compl. ¶¶ 26, 48). And law enforcement has
12 defendant's own admissions to, for example, physically assaulting
13 S.S. the night that he robbed him. (Ex. 23-24.)

14 Even the evidence of defendant's uncharged but related and
15 relevant conduct is overwhelming. Witness after witness have
16 described defendant's violent tactics. And, with respect to the
17 shooting, for example, those witness statements are corroborated by
18 surveillance video, where defendant can be seen leaning into the car
19 as described (Ex. 13 (first video clip)) and bystanders shortly
20 thereafter can be seen taking cover after being startled by a gunshot
21 (Ex. 14 (second video clip)). Moreover, defendant's phone's cell-
22 site data shows that he was in the area at the time of the shooting.
23 (Ex. 15 (pertinent cell-site records highlighted in yellow).)

24 All the evidence in this case conclusively shows defendant's
25 coordinated violence against workers in Koreatown and installation of
26 fear in his victims for years, for defendant's financial gain. See
27 United States v. Barone, 387 F. App'x 88, 89-90 (2d Cir. 2010) ("The
28 fact that Barone . . . planned violent crimes . . . signals a degree

1 of dangerousness unlikely to be deterred by bail release
2 conditions."). Accordingly, the weight of the evidence favors
3 defendant's continued detention.

4 3. History and Characteristics of Defendant

5 Defendant's history and characteristics also favor detention.

6 Defendant's possession of three firearms, as well as a
7 suppressor -- while engaged in a violent extortion scheme, not to
8 mention while serving a diversion sentence for firearms charges --
9 supports his detention based on danger. See Zhang, 55 F.4th at 150
10 (affirming detention of murder-for-hire defendant based on social
11 media post "in which he displayed a veritable arsenal of firearms in
12 the trunk of his car"); Barone, 387 F. App'x at 90 (affirming
13 detention based on danger where "[a]t the time of his arrest, Barone
14 was in possession of two firearms [and] ammunition"). Further,
15 defendant is suspected of being involved in a shooting. In July of
16 last year, a victim reported that defendant approached his car as he
17 tried to drop off two doumis at a karaoke bar. According to the
18 victim, defendant appeared to have something in his waistband and
19 told him that he was not allowed to drop off doumis at that location
20 and had to leave. As they left, one of the doumis was shot in the
21 neck.

22 Defendant's demonstrated lack of regard for human life in
23 committing violence against many individuals, including with a
24 firearm and baseball bat, casts his possession of multiple
25 instruments of death in an alarming light. His possession of
26 unregistered firearms militates in favor of detention.

27 And defendant's criminal conduct, including the crimes that he
28 is now charged with and the other crimes that witnesses have

1 reported, while serving a diversion sentence shows that defendant is
2 not amenable to pretrial supervision here. Indeed, a release order
3 containing conditions "[p]rohibiting a defendant from committing a
4 crime or intimidating a witness does not at all impede his ability to
5 do so, and requires no more of him than that which the law already
6 demands from a defendant and every other citizen." United States v.
7 Ferranti, 66 F.3d 540, 544 (2d Cir. 1995). Defendant could not even
8 follow the law to ensure that he would receive the benefits of
9 diversion, so expecting him to follow the law, and any other
10 conditions that the Court may impose for pretrial release, is
11 nonsensical. In other words, it is not solely the fact that
12 defendant is charged in this case that demonstrates he would
13 constitute a danger to the community if released, but rather his
14 pattern of criminal conduct even while under supervision.

15 The Pretrial Services Report from defendant's initial appearance
16 also supports the conclusion that defendant is a risk of non-
17 appearance. According to that report, when law enforcement ordered
18 defendant to come out of his house, defendant refused and began a
19 five-to-ten-minute standoff. During the standoff, defendant tried to
20 escape from a bathroom window but repositioned himself in the house
21 when he saw law enforcement outside. Again, defendant attempted this
22 escape while serving a diversion sentence for charges including the
23 attempted destruction of evidence.

24 Finally, defendant faces a statutory maximum of 20 years for
25 each of the 33 extortion and attempted extortion counts, see 18
26 U.S.C. § 1951, and 25 years for the carjacking count, see 18 U.S.C.
27 § 2119(2). The possibility of a lengthy prison sentence may motivate
28 defendant to not appear for future court hearings. See United States

1 v. Townsend, 897 F.2d 989, 994-95 (9th Cir. 1990) (holding that the
2 district court properly considered "penalties possible under the
3 present indictment" as providing an "incentive to consider flight,"
4 and noting that electronic monitoring cannot assure prevention of
5 non-appearance). Moreover, defendant is a Korean citizen, is fluent
6 in the language, and could presumably easily flee to Korea.⁵

7 4. Nature and Seriousness of the Danger Posed by
8 Defendant's Release

9 For years, defendant has used violence to extort multiple
10 victims and strangle the karaoke industry in Koreatown. He is not
11 only a risk of danger to the community but has acted on his
12 dangerousness time and again.

13 Defendant proposes conditions of release that include bond from
14 sureties with real property with \$500,000 of equity. Even if the
15 Court accepted that proposal as mitigating the risk of non-
16 appearance, significant bond resources, including property, do
17 nothing to eliminate the risk of danger to the community. See Rep.
18 No. 225, 98th Congress, 1st Sess. 1983, 1984 U.S.C.A.N. 3182, 3198-99
19 (n.60) (Congress finding that "a defendant who is a danger to the
20 community remains dangerous even if he has posted a substantial money
21 bond"); see, e.g., United States v. Hir, 517 F.3d 1081, 1092 (9th
22 Cir. 2008) (affirming district court's denial of proposed \$600,000
23 secured bail package based on risk defendant posed to the community).

24 Nor do prohibitions against contacting victims or witnesses
25 alleviate the danger defendant poses. See United States v. Colombo,

27
28 ⁵ Defendant was a legal permanent resident in the United States,
but his status was revoked due to marriage fraud. Defendant is
currently appealing that ruling.

1 777 F.2d 96, 100 (2d Cir. 1985) (reversing grant of pretrial release
2 members where release conditions "clearly inadequate to protect the
3 public" because "prohibiting [defendant] from committing a crime or
4 intimidating a witness does not at all impede his ability to do so").
5 Until he was taken into custody, defendant was a serious danger,
6 including to S.S. who had to pay defendant again approximately an
7 hour and a half before defendant was arrested because S.S. feared
8 defendant and did not know about his forthcoming arrest. See, e.g.,
9 United States v. Petrov, 604 F. App'x 66, 67 (2d Cir. 2015)
10 (affirming district court's detention order in extortion case where
11 defendant "threatened the complainant and had previously threatened
12 and orchestrated an assault on the complainant's cousin").

13 Defendant's documented awareness of law enforcement
14 investigation techniques and eagerness to avoid detection (by, for
15 example, questioning karaoke bar operators about their surveillance
16 cameras and engaging in countersurveillance when attempting to extort
17 his victim) further counsels against release on these conditions.
18 Given defendant's previous efforts to avoid detection, any release
19 conditions would be "critical[ly] flaw[ed]." Hir, 517 F.3d at 1092.
20 "In order to be effective, they depend on [the defendant]'s good
21 faith compliance and are too easily circumvented or manipulated."
22 Id.; see also United States v. Tortora, 922 F.2d 880, 886 (1st Cir.
23 1990) (reversing release order finding that restrictions on
24 communications with any person not approved by counsel, monitoring of
25 phone through pen register, 24-hour house arrest, and other
26 conditions had "an Achilles' heel" because "virtually all of them
27 hinge on the defendant's good faith compliance").

1 **IV. CONCLUSION**

2 For the foregoing reasons, the government respectfully requests
3 that this Court deny defendant's application for release. If this
4 Court is inclined to grant bail, the government respectfully requests
5 that this Court either (1) stay its bail order pending appeal per
6 Federal Rule of Appellate Procedure 8(a)(1)(A), or (2) order
7 continued detention pending a government appeal per 18 U.S.C.
8 § 3143(c).

DECLARATION OF JENA A. MACCABE

I, Jena A. MacCabe, declare as follows:

1. I am an Assistant United States Attorney in the United States Attorney's Office for the Central District of California. I am the attorney representing the government in this case.

2. Attached hereto as Exhibit 1 are some Venmo payments that defendant extorted from Y.S. and J.L., which are being filed under seal concurrently with this filing. The underlying records provided by Venmo have been produced to the defense but are not being transmitted to this Court at this time due to their size.

3. Attached hereto as Exhibit 2 are some text messages that J.L. reasonably believes are from defendant, which are being filed under seal concurrently with this filing.

4. Attached hereto as Exhibit 3 are some text messages from defendant that S.S. provided, which are being filed under seal concurrently with this filing.

5. Attached hereto as Exhibit 4 are some text messages from defendant that a confidential source provided, which are being filed under seal concurrently with this filing.

6. Attached hereto as Exhibit 5 are some text messages from defendant that Y.S. provided, which are being filed under seal concurrently with this filing.

7. Attached hereto as Exhibit 6 is dash camera footage from Y.S.'s car capturing defendant on audio, which is being manually filed concurrently with this filing.

8. Attached hereto as Exhibits 7 and 8 is CCTV footage of defendant's carjacking, which is being manually filed concurrently with this filing.

1 9. Attached hereto as Exhibit 9 is defendant's Instagram post
2 of himself wearing a skeleton mask shortly after the carjacking that
3 Y.S. provided.

4 10. Attached hereto as Exhibit 10 is a photograph of some items
5 seized during the searches of defendant's residence, vehicles, and
6 person on March 16, 2023.

7 11. Attached hereto as Exhibit 11 are some Venmo payments that
8 defendant extorted from S.S., which are being filed under seal
9 concurrently with this filing. The underlying records provided by
10 Venmo have been produced to the defense but are not being transmitted
11 to this Court at this time due to their size.

12 12. Attached hereto as Exhibit 12 is a report of an interview
13 with S.S., which is being filed under seal concurrently with this
14 filing.

15 13. Attached hereto as Exhibits 13 and 14 are videos from the
16 karaoke bar where a doumi was shot, which are being manually filed
17 concurrently with this filing.

18 14. Attached hereto as Exhibit 15 are some records of
19 defendant's cell-site data.

20 15. Attached hereto as Exhibit 16 is the report of
21 investigation briefly summarizing defendant's arrest and the
22 execution of the search warrants.

23 16. Attached hereto as Exhibit 17 is the inventory of items
24 seized during the execution of the search warrants.

25 17. Attached hereto as Exhibit 18 is a report of an interview
26 with a victim after defendant's arrest, which is being filed under
27 seal concurrently with this filing.

EXHIBIT 1

DOCUMENT UNDER SEAL

EXHIBIT 2

DOCUMENT UNDER SEAL

EXHIBIT 3

DOCUMENT UNDER SEAL

EXHIBIT 4

DOCUMENT UNDER SEAL

EXHIBIT 5

DOCUMENT UNDER SEAL

EXHIBIT 6

VIDEO

MANUALLY FILED

EXHIBIT 7

**VIDEO
MANUALLY FILED**

EXHIBIT 8

**VIDEO
MANUALLY FILED**

EXHIBIT 9



godkingbabyloc 2시간



메시지 보내기



EXHIBIT 10

EXHIBIT 11

DOCUMENT UNDER SEAL

EXHIBIT 12

DOCUMENT UNDER SEAL

EXHIBIT 13

VIDEO

MANUALLY FILED

EXHIBIT 14

VIDEO

MANUALLY FILED

EXHIBIT 15

Information Provided To:



Agency: Homeland Security
 Requestor: MICHAEL CHOI
 Agent Address: DHS/ICE/HSI
 Billing City, State, Zip: LONG BEACH, CA 90802-0000
 Provided On: February 09, 2023

Request Submission Response

This is in response to the Search Warrant, 193723VLOPINGO, dated February 02, 2023, which was served upon T-Mobile US, Inc. You have requested information for the subscriber associated with MSISDN: 9496643131. All times below are reflected in Coordinated Universal Time (UTC).

Date	Time	Duration	Call Type	Direction	Calling Number	Dialed Number	Called Number	Destination Number	IMSI	IMEI	Completion Code	Service Code
07/14/2022	18:42:31	8	mtc	Incoming	19043807599	19496643131	19496643131	19496643131	310260272634194	356862190952820	Completed Successfully	02A;11
07/14/2022	18:43:03	8	moc	Outgoing	19043807599	13608429999	13608429999	13608429999	310260272634194	356862190952820	Completed Successfully	02A
07/15/2022	00:31:20	29	mtc	Incoming	13103722573	19496643131	19496643131	19496643131	310260272634194	356862190952820	Completed Successfully	02A;11
07/15/2022	00:31:52	29	moc	Outgoing	13103722573	13608429999	13608429999	13608429999	310260272634194	356862190952820	Completed Successfully	02A
07/15/2022	00:32:25		SMSC		128		19496643131				Completed Successfully	
07/15/2022	08:43:17		SMSC		19099198466		19496643131				Completed Successfully	
07/15/2022	08:43:19		SMSC		19099198466		19496643131				Completed Successfully	
07/15/2022	08:46:42		SMSC		19496643131		19099198466				Completed Successfully	
07/15/2022	08:55:27	98	mtc	Incoming	12138040077	19496643131	19496643131	19496643131	310260272634194	356862190952820	Completed Successfully	11
07/15/2022	08:57:10		SMSC		19099198466		19496643131				Completed Successfully	
07/15/2022	08:57:22		SMSC		19099198466		19496643131				Completed Successfully	
07/15/2022	08:57:24		SMSC		19099198466		19496643131				Completed Successfully	
07/15/2022	09:00:59		SMSC		19496643131		19099198466				Completed Successfully	
07/15/2022	09:06:09		SMSC		19099198466		19496643131				Completed Successfully	
07/15/2022	09:12:14	183	moc	Outgoing	19496643131	12138040077	12138040077	12138040077	310260272634194	356862190952820	Completed Successfully	
07/15/2022	09:15:33	16	moc	Outgoing	19496643131	12138040077	12138040077	12138040077	310260272634194	356862190952820	Completed Successfully	
07/15/2022	09:44:17		moc	Outgoing	19496643131	12138040077	12138040077	12138040077	310260272634194	356862190952820	Completed Successfully	
07/15/2022	09:51:19	190	moc	Outgoing	19496643131	12138040077	12138040077	12138040077	310260272634194	356862190952820	Completed Successfully	
07/15/2022	09:57:53		SMSC		19099198466		19496643131				Completed Successfully	

Information Provided By:

T-Mobile US, Inc.
 Law Enforcement Relations

4 Sylvan Way, Parsippany, New Jersey 07054
 Tel: 866-537-0911; Fax: 973-292-8697

07/15/2022	10:07:43		SMSC		19099198466		19496643131				Completed	
07/15/2022	10:08:43		moc	Outgoing	19496643131	12138040077	12138040077	12138040077	310260272634194	356862190952820	Successfully	
07/15/2022	22:39:13		SMSC		19496643131		19099198466				Abnormal	
07/15/2022	22:39:50		SMSC		19099198466		19496643131				Completion	
07/15/2022	22:39:54		SMSC		19099198466		19496643131				Completed	
07/15/2022	22:40:42		SMSC		19496643131		19099198466				Successfully	
07/15/2022	22:40:54		SMSC		19099198466		19496643131				Completed	
07/15/2022	22:41:01		SMSC		19496643131		19099198466				Successfully	
07/15/2022	22:41:09		SMSC		19099198466		19496643131				Completed	
07/15/2022	22:42:04		SMSC		19496643131		19099198466				Successfully	
07/15/2022	22:42:14		SMSC		19099198466		19496643131				Completed	
07/16/2022	01:26:45		SMSC		19496643131		13102103937				Successfully	
07/16/2022	03:06:35	295	moc	Outgoing	19496643131	12138040077	12138040077	12138040077	310260272634194	356862190952820	Completed	
07/16/2022	03:40:58	2	moc	Outgoing	19496643131	12134487726	12134487726	12134487726	310260272634194	356862190952820	Successfully	
07/16/2022	03:45:55	1	moc	Outgoing	19496643131	12132009485	12132009485	12132009485	310260272634194	356862190952820	Completed	
07/16/2022	06:22:44		mtc	Incoming	12132009485	19496643131	19496643131	19496643131	310260272634194	356862190952820	Successfully	
07/16/2022	08:43:10		SMSC		13234241460		19496643131				Abnormal	11
07/16/2022	08:56:43		SMSC		19496643131		13234241460				Completion	
07/16/2022	20:30:06		SMSC		18187950460		19496643131				Completed	
07/16/2022	20:30:06		SMSC		18187950460		19496643131				Successfully	
07/16/2022	20:30:07		SMSC		18187950460		19496643131				Completed	
07/16/2022	20:30:07		SMSC		18187950460		19496643131				Successfully	
07/16/2022	20:30:07		SMSC		18187950460		19496643131				Completed	
07/16/2022	20:30:39		SMSC		18187950460		19496643131				Successfully	
07/16/2022	20:31:07		SMSC		18187950460		19496643131				Completed	
07/16/2022	20:45:36		SMSC		19496643131		18187950460				Successfully	
07/16/2022	21:10:40		SMSC		18187950460		19496643131				Completed	
07/16/2022	22:06:02		SMSC		18187950460		19496643131				Successfully	
											Completed	
											Successfully	

07/16/2022	22:06:50	SMSC	19496643131	18187950460	Completed Successfully
07/16/2022	22:07:41	SMSC	18187950460	19496643131	Completed Successfully

Switch Name	1st LTE Site ID	1st LTE Sector ID	1st LAC	1st Cell ID	1st Tower Azimuth	1st Tower LAT	1st Tower LONG	1st Tower Address	1st Tower City	1st Tower State	1st Tower Zip	Last LTE Site ID	Last LTE Sector ID
PXTAS201	87038	8			120	34.164314	-118.377297	11272 MAGNOLIA BLVD	North Hollywood	CA	91601		
PXTAS201	87038	8			120	34.164314	-118.377297	11272 MAGNOLIA BLVD	North Hollywood	CA	91601		
PXTAS201	176637	2			325	34.0306	-118.208	2930 Whittier Blvd	Los Angeles	CA	90023-1529		
PXTAS201	176637	2			325	34.0306	-118.208	2930 Whittier Blvd	Los Angeles	CA	90023-1529		
mavsms_pol05													
mavsms_ttn02													
mavsms_ttn02													
mavsms_pol04													
PXTAS201	86316	1				34.0688	-118.305	300 S. Hobart Blvd.	Los Angeles	CA	90020		
mavsms_pol04													
mavsms_pol06													
mavsms_ttn02													
mavsms_pol06													
mavsms_pol02													
PXTAS201	80949	8			110	34.16011111	-118.372047	4907 Lankershim Blvd.	Los Angeles	CA	91601		
PXTAS201	87038	8			120	34.164314	-118.377297	11272 MAGNOLIA BLVD	North Hollywood	CA	91601		
PXTAS201	87038	8			120	34.164314	-118.377297	11272 MAGNOLIA BLVD	North Hollywood	CA	91601		
PXTAS201	87038	8			120	34.164314	-118.377297	11272 MAGNOLIA BLVD	North Hollywood	CA	91601		
mavsms_pol06													

Information Provided By:
T-Mobile US, Inc.
Law Enforcement Relations

4 Sylvan Way, Parsippany, New Jersey 07054
Tel: 866-537-0911; Fax: 973-292-8697

Page: 4 of 9

000539

mavsms_ttn03

PXTAS201	87038	8	120	34.164314	-118.377297	11272 MAGNOLIA BLVD	North Hollywood	CA	91601
----------	-------	---	-----	-----------	-------------	---------------------	-----------------	----	-------

mavsms_ttn01

mavsms_pol05

mavsms_ttn05

mavsms_ttn05

mavsms_ttn03

mavsms_ttn02

mavsms_ttn04

mavsms_ttn03

mavsms_ttn03

mavsms_pol02

PXTAS201	80888	3	240	34.151971	-118.367669	10850 RIVERSIDE DR	North Hollywood	CA	91602
PXTAS201	87038	8	120	34.164314	-118.377297	11272 MAGNOLIA BLVD	North Hollywood	CA	91601
PXTAS201	87038	1		34.164314	-118.377297	11272 MAGNOLIA BLVD	North Hollywood	CA	91601
PXTAS201	184792	8	120	34.098367	-118.349715	7323 SUNSET BL	Los Angeles	CA	90046

mavsms_ttn06

mavsms_ttn05

mavsms_pol04

mavsms_ttn04

mavsms_pol01

mavsms_ttn04

mavsms_ttn01

mavsms_pol04

mavsms_pol06

mavsms_pol02

mavsms_pol04

Information Provided By:
T-Mobile US, Inc.
Law Enforcement Relations

4 Sylvan Way, Parsippany, New Jersey 07054
Tel: 866-537-0911; Fax: 973-292-8697

Page: 5 of 9

000540

mavsms_pol02

mavsms_pol04

Last LAC ID	Last Cell ID	Last Tower Azimuth	Last Tower LAT	Last Tower LONG	Last Tower Address	Last Tower City	Last Tower State	Last Tower Zip
-------------	--------------	-----------------------	----------------	--------------------	--------------------	-----------------	---------------------	-------------------

Information Provided By:
T-Mobile US, Inc.
Law Enforcement Relations

4 Sylvan Way, Parsippany, New Jersey 07054
Tel: 866-537-0911; Fax: 973-292-8697

Page: 7 of 9

000542

Information Provided By:
T-Mobile US, Inc.
Law Enforcement Relations

4 Sylvan Way, Parsippany, New Jersey 07054
Tel: 866-537-0911; Fax: 973-292-8697

Page: 8 of 9

000543

Information Provided By:
T-Mobile US, Inc.
Law Enforcement Relations

4 Sylvan Way, Parsippany, New Jersey 07054
Tel: 866-537-0911; Fax: 973-292-8697

Page: 9 of 9

000544

EXHIBIT 16



DEPARTMENT OF HOMELAND SECURITY



HOMELAND SECURITY INVESTIGATIONS

REPORT OF INVESTIGATION

OFFICIAL USE ONLY | LAW ENFORCEMENT SENSITIVE

07/30/2023 16:27 EDT

Page 1 of 2

CASE NUMBER

LX05HS22LX0001

CASE OPENED

3/19/2022

CURRENT CASE TITLE

Operation Karaoke

REPORT TITLE

Arrest of Daekun CHO and Search
Warrant at 5136 Topanga Canyon
Blvd., Woodland Hills, CA 91364 on
March 16, 2023

SYNOPSIS

On or about March 12, 2022, Los Angeles Police Department (LAPD) provided information that Daekun CHO (CHO) is involved with an organization that is currently extorting businesses and individuals in the Koreatown, Los Angeles area. HSI LAX will further investigate this organization.

This Report of Investigation (ROI) serves to document the federal arrest of Daekun CHO and the search warrant executed at 5136 Topanga Canyon Blvd., Woodland Hills, CA 91364 on March 16, 2023.

REPORTED BY

Michael Choi
SPECIAL AGENT

APPROVED BY

Aaron Nakayama
HSI NATIONAL PROGRAM
MANAGER

DATE APPROVED

3/20/2023

Current Case Title

Operation Karaoke

ROI Number

LX05HS22LX0001-036

Date Approved

3/20/2023

OFFICIAL USE ONLY | LAW ENFORCEMENT SENSITIVE



DEPARTMENT OF HOMELAND SECURITY



HOMELAND SECURITY INVESTIGATIONS

REPORT OF INVESTIGATION

OFFICIAL USE ONLY | LAW ENFORCEMENT SENSITIVE

07/30/2023 16:27 EDT

Page 2 of 2

DETAILS OF INVESTIGATION

On or about March 12, 2022, Los Angeles Police Department (LAPD) provided information that Daekun CHO (CHO) is involved with an organization that is currently extorting businesses and individuals in the Koreatown, Los Angeles area. HSI LAX will further investigate this organization.

On March 16, 2023, at approximately 0400 hours, Homeland Security Investigations (HSI) Los Angeles International Airport (LAX), in conjunction with the Los Angeles Police Department (LAPD) and the HSI Los Angeles (LA) Special Response Team (SRT) executed a federal arrest for Daekun CHO (DOB: [REDACTED]/1984) and search warrant of 5136 Topanga Canyon Blvd., Woodland Hills, CA 91364 for violations of 18 U.S.C. § 1951 (interference with commerce by threats or violence), 18 U.S.C. § 371 (conspiracy to commit extortion), 18 U.S.C. § 924(c) (use of a firearm in furtherance of a crime of violence), and 18 U.S.C. § 2119 (carjacking). During the search, HSI LAX seized one 80% manufactured AR pistol, one Glock 17, and one Masterpiece Arms MPA30SST pistol along with various prohibited magazines, and bulk currency suspected of being proceeds from CHO's extortion and intimidation schemes. CHO was arrested on charges of 18 U.S.C. § 1951 (interference with commerce by threats or violence) and transported to the Los Angeles Metropolitan Detention Center for holding prior to his initial appearance in federal court.

During the initial surround and call out by SRT, CHO did not come out of the premises, so SRT initiated entry procedures. SRT observed CHO open the window from the bathroom and it appeared he was getting ready to lift himself up to jump out. SRT shouted commands for CHO to surrender himself, but CHO disappeared back into the premises. SRT then observed CHO peering through the blinds of a window on the opposite side of the premises. At approximately 0408 hours, CHO was detained. Upon making entry into the premises, SRT observed an AR pistol in the master bedroom in plain sight. The AR had a fully loaded magazine inserted with the weapon on fire.

CHO agreed to speak with Special Agent (SA) Michael Choi and SA Michael Yun without his attorney present. A separate ROI will document the interview.

THIS INVESTIGATION CONTINUES.

Current Case Title

Operation Karaoke

ROI Number

LX05HS22LX0001-036

Date Approved

3/20/2023

OFFICIAL USE ONLY | LAW ENFORCEMENT SENSITIVE

This document is loaned to you for official use only and remains the property of the Department of Homeland Security. Any further request for disclosure of this document or information contained herein should be referred to HSI Headquarters together with a copy of the document.

EXHIBIT 17



DEPARTMENT OF HOMELAND SECURITY

HOMELAND SECURITY INVESTIGATIONS

INCIDENT REPORT

OFFICIAL USE ONLY | LAW ENFORCEMENT SENSITIVE



07/30/2023 16:03 EDT

Page 1 of 26

Federal Search Warrant at 5136 Topanga Canyon Blvd., Woodland Hills, CA 91364 on March 16, 2023

Incident Overview

Topic/Title	Federal Search Warrant at 5136 Topanga Canyon Blvd., Woodland Hills, CA 91364 on March 16, 2023
Document Number	LX05HS22LX0001-IN003
SEACATS Incident Number	2023SZ0046033
FP&F Case Number	2023272000198101
Incident Type	SZ - SEIZURE
Port Code	2720 - LAX INTL ARPT
Conveyance Type Type	N - NO TRANSPORTATION INVOLVED
Seizure Date	03/16/2023 04:00
Contributing Info Indicator	Yes
SEACATS Incident ID	6951941
Enforcement Action ID	6966322
SEACATS Status Code	08 - Approved
Occurrence Date and Time	03/16/2023 04:00

Seizure Details

Seizing Agency Agency/Unit/Group	HSI - HSI Special Agent
--	-------------------------

Case Number

LX05HS22LX0001

Case Title

Operation Karaoke

EAGLE Event Number

Not Specified

Date Approved

3/16/2023

OFFICIAL USE ONLY | LAW ENFORCEMENT SENSITIVE

This document is loaned to you for official use only and remains the property of the Department of Homeland Security. Any further request for disclosure of this document or information contained herein should be referred to HSI Headquarters together with a copy of the document.



DEPARTMENT OF HOMELAND SECURITY

HOMELAND SECURITY INVESTIGATIONS

INCIDENT REPORT



OFFICIAL USE ONLY | LAW ENFORCEMENT SENSITIVE

07/30/2023 16:03 EDT

Page 2 of 26

Seizing Participating Agency Agency/Unit/Group	HSI - HSI Special Agent
Seizing Participating Agency Agency/Unit/Group	STL - STATE AND/OR LOCAL LAW ENFORCEMENT
Seizing Participating Agency Agency/Unit/Group	TFO - HSI Task Force Officer

Violator Information

Violator Type	INDIVIDUAL
Suspect Name Last First	CHO Daekun
Date of Birth	■■■■/1984
Gender Gender	M - MALE
Race	A - ASIAN
Hispanic Indicator	N - NOT OF HISPANIC OR LATINO ORIGIN
Citizenship Country	KOR - Korea, Republic of

Seizure Line Item Statistics

Incident Line Item Number	1
Incident Sub-Line Item Number	0000
Line Item Type Category Type	OTH - General MDS/Other CEL - Mobile Comm Devices
Value	0
Line Item Description	Black Apple Iphone

Case Number

LX05HS22LX0001

Case Title

Operation Karaoke

EAGLE Event Number

Not Specified

Date Approved

3/16/2023

OFFICIAL USE ONLY | LAW ENFORCEMENT SENSITIVE

This document is loaned to you for official use only and remains the property of the Department of Homeland Security. Any further request for disclosure of this document or information contained herein should be referred to HSI Headquarters together with a copy of the document.



DEPARTMENT OF HOMELAND SECURITY

HOMELAND SECURITY INVESTIGATIONS

INCIDENT REPORT



OFFICIAL USE ONLY | LAW ENFORCEMENT SENSITIVE

07/30/2023 16:03 EDT

Page 3 of 26

Property Legal Status	EV - Evidence - Single Status
Property Physical Status	HE - Held by Customs
Seizure Statistic	
Type	SZ - SEIZURE
Date	March 16, 2023
Status	Approved

Incident Line Item Number	2
Incident Sub-Line Item Number	0000
Line Item Type	
Category	ARM - Arms/Ammo/Explosives
Type	PTL - Pistol
Quantity	1
Unit of Measure	EA - UNITS
Value	0
Line Item Description	Pistol with barrel extension
Caliber	9mm
Manufacturer	Masterpiece Arms
Model	Defender
Serial Number	FX34976
Property Legal Status	EN - Evidence - Dual Status (Forfeitable)
Property Physical Status	HE - Held by Customs
Seizure Statistic	
Type	SZ - SEIZURE
Date	March 16, 2023
Status	Approved

Incident Line Item Number	3
----------------------------------	---

Case Number

LX05HS22LX0001

Case Title

Operation Karaoke

EAGLE Event Number

Not Specified

Date Approved

3/16/2023

OFFICIAL USE ONLY | LAW ENFORCEMENT SENSITIVE

This document is loaned to you for official use only and remains the property of the Department of Homeland Security. Any further request for disclosure of this document or information contained herein should be referred to HSI Headquarters together with a copy of the document.



DEPARTMENT OF HOMELAND SECURITY

HOMELAND SECURITY INVESTIGATIONS

INCIDENT REPORT



OFFICIAL USE ONLY | LAW ENFORCEMENT SENSITIVE

07/30/2023 16:03 EDT

Page 4 of 26

Incident Sub-Line Item Number	0000
Quantity	1
Unit of Measure	EA - UNITS
Value	0
Line Item Description	Masterpiece Arms magazine
Caliber	9mm
Serial Number	N/A
Property Legal Status	EN - Evidence - Dual Status (Forfeitable)
Property Physical Status	HE - Held by Customs
Seizure Statistic	
Type	SZ - SEIZURE
Date	March 16, 2023
Status	Approved

Incident Line Item Number	4
Incident Sub-Line Item Number	0000
Line Item Type	
Category	ARM - Arms/Ammo/Explosives
Type	AMM - Ammunition
Quantity	20
Unit of Measure	EA - UNITS
Value	0
Line Item Description	Ammunition from masterpiece arms magazine
Caliber	9mm
Serial Number	N/A
Property Legal Status	EN - Evidence - Dual Status (Forfeitable)
Property Physical Status	HE - Held by Customs

Case Number	Case Title	EAGLE Event Number	Date Approved
LX05HS22LX0001	Operation Karaoke	Not Specified	3/16/2023

OFFICIAL USE ONLY | LAW ENFORCEMENT SENSITIVE

This document is loaned to you for official use only and remains the property of the Department of Homeland Security. Any further request for disclosure of this document or information contained herein should be referred to HSI Headquarters together with a copy of the document.



DEPARTMENT OF HOMELAND SECURITY

HOMELAND SECURITY INVESTIGATIONS

INCIDENT REPORT



OFFICIAL USE ONLY | LAW ENFORCEMENT SENSITIVE

07/30/2023 16:03 EDT

Page 5 of 26

Seizure Statistic	
Type	SZ - SEIZURE
Date	March 16, 2023
Status	Approved

Incident Line Item Number	5
Incident Sub-Line Item Number	0000
Quantity	1
Unit of Measure	EA - UNITS
Value	0
Line Item Description	Pistol Magazine
Caliber	9mm
Manufacturer	SGM Tactical
Model	30 round
Serial Number	N/A
Property Legal Status	EN - Evidence - Dual Status (Forfeitable)
Property Physical Status	HE - Held by Customs
Seizure Statistic	
Type	SZ - SEIZURE
Date	March 16, 2023
Status	Approved

Incident Line Item Number	6
Incident Sub-Line Item Number	0000
Line Item Type	
Category	ARM - Arms/Ammo/Explosives
Type	AMM - Ammunition
Quantity	24

Case Number

LX05HS22LX0001

Case Title

Operation Karaoke

EAGLE Event Number

Not Specified

Date Approved

3/16/2023

OFFICIAL USE ONLY | LAW ENFORCEMENT SENSITIVE

This document is loaned to you for official use only and remains the property of the Department of Homeland Security. Any further request for disclosure of this document or information contained herein should be referred to HSI Headquarters together with a copy of the document.



DEPARTMENT OF HOMELAND SECURITY

HOMELAND SECURITY INVESTIGATIONS

INCIDENT REPORT



OFFICIAL USE ONLY | LAW ENFORCEMENT SENSITIVE

07/30/2023 16:03 EDT

Page 6 of 26

Unit of Measure	EA - UNITS
Value	0
Line Item Description	Ammunition from SGM Tactical 30 Round Magazine
Caliber	9mm
Serial Number	N/A
Property Legal Status	EN - Evidence - Dual Status (Forfeitable)
Property Physical Status	HE - Held by Customs
Seizure Statistic	
Type	SZ - SEIZURE
Date	March 16, 2023
Status	Approved

Incident Line Item Number	7
Incident Sub-Line Item Number	0000
Line Item Type	
Category	ARM - Arms/Ammo/Explosives
Type	PTL - Pistol
Quantity	1
Unit of Measure	EA - UNITS
Value	0
Line Item Description	Glock Pistol
Caliber	9mm
Manufacturer	Glock
Model	17 Gen 5
Serial Number	BSVE192
Property Legal Status	EN - Evidence - Dual Status (Forfeitable)
Property Physical Status	HE - Held by Customs

Case Number	Case Title	EAGLE Event Number	Date Approved
LX05HS22LX0001	Operation Karaoke	Not Specified	3/16/2023

OFFICIAL USE ONLY | LAW ENFORCEMENT SENSITIVE

This document is loaned to you for official use only and remains the property of the Department of Homeland Security. Any further request for disclosure of this document or information contained herein should be referred to HSI Headquarters together with a copy of the document.



DEPARTMENT OF HOMELAND SECURITY

HOMELAND SECURITY INVESTIGATIONS

INCIDENT REPORT



OFFICIAL USE ONLY | LAW ENFORCEMENT SENSITIVE

07/30/2023 16:03 EDT

Page 7 of 26

Seizure Statistic	
Type	SZ - SEIZURE
Date	March 16, 2023
Status	Approved

Incident Line Item Number	8
Incident Sub-Line Item Number	0000
Line Item Type	
Category	CCM - Currency/Monetary
Type	CSH - US Cash or Currency
Quantity	279
Unit of Measure	PC - PIECES
Value	20733
Line Item Description	U.S. Currency
Property Legal Status	SZ - Seized
Property Physical Status	DP - Deposited to BCA
Seizure Statistic	
Type	SZ - SEIZURE
Date	March 16, 2023
Status	Approved
Final Statistic	
Type	DP - DEPOSIT CURRENCY
Date	March 20, 2023
Status	Approved

Incident Line Item Number	9
Incident Sub-Line Item Number	0000
Line Item Type	
Category	ARM - Arms/Ammo/Explosives
Type	AMM - Ammunition

Case Number

LX05HS22LX0001

Case Title

Operation Karaoke

EAGLE Event Number

Not Specified

Date Approved

3/16/2023

OFFICIAL USE ONLY | LAW ENFORCEMENT SENSITIVE

This document is loaned to you for official use only and remains the property of the Department of Homeland Security. Any further request for disclosure of this document or information contained herein should be referred to HSI Headquarters together with a copy of the document.



DEPARTMENT OF HOMELAND SECURITY

HOMELAND SECURITY INVESTIGATIONS

INCIDENT REPORT



OFFICIAL USE ONLY | LAW ENFORCEMENT SENSITIVE

07/30/2023 16:03 EDT

Page 8 of 26

Quantity	353
Unit of Measure	EA - UNITS
Value	0
Line Item Description	Bulk Ammunition
Caliber	9mm
Manufacturer	Various
Serial Number	N/A
Property Legal Status	EN - Evidence - Dual Status (Forfeitable)
Property Physical Status	HE - Held by Customs
Seizure Statistic	
Type	SZ - SEIZURE
Date	March 16, 2023
Status	Approved

Incident Line Item Number	10
Incident Sub-Line Item Number	0000
Line Item Type	
Category	OTH - General MDS/Other
Type	ZZZ - Other
Quantity	2
Unit of Measure	EA - UNITS
Value	0
Line Item Description	Knives
Property Legal Status	EV - Evidence - Single Status
Property Physical Status	HE - Held by Customs

Case Number	Case Title	EAGLE Event Number	Date Approved
LX05HS22LX0001	Operation Karaoke	Not Specified	3/16/2023

OFFICIAL USE ONLY | LAW ENFORCEMENT SENSITIVE

This document is loaned to you for official use only and remains the property of the Department of Homeland Security. Any further request for disclosure of this document or information contained herein should be referred to HSI Headquarters together with a copy of the document.



DEPARTMENT OF HOMELAND SECURITY

HOMELAND SECURITY INVESTIGATIONS

INCIDENT REPORT



OFFICIAL USE ONLY | LAW ENFORCEMENT SENSITIVE

07/30/2023 16:03 EDT

Page 9 of 26

Seizure Statistic	
Type	SZ - SEIZURE
Date	March 16, 2023
Status	Approved

Incident Line Item Number	11
Incident Sub-Line Item Number	0000
Line Item Type	
Category	OTH - General MDS/Other
Type	ZZZ - Other
Quantity	1
Unit of Measure	EA - UNITS
Value	0
Line Item Description	Pink Baseball Bat
Property Legal Status	EV - Evidence - Single Status
Property Physical Status	HE - Held by Customs
Seizure Statistic	
Type	SZ - SEIZURE
Date	March 16, 2023
Status	Approved

Incident Line Item Number	12
Incident Sub-Line Item Number	0000
Line Item Type	
Category	ARM - Arms/Ammo/Explosives
Type	AMM - Ammunition
Quantity	20
Unit of Measure	EA - UNITS
Value	0

Case Number

LX05HS22LX0001

Case Title

Operation Karaoke

EAGLE Event Number

Not Specified

Date Approved

3/16/2023

OFFICIAL USE ONLY | LAW ENFORCEMENT SENSITIVE

This document is loaned to you for official use only and remains the property of the Department of Homeland Security. Any further request for disclosure of this document or information contained herein should be referred to HSI Headquarters together with a copy of the document.



DEPARTMENT OF HOMELAND SECURITY

HOMELAND SECURITY INVESTIGATIONS

INCIDENT REPORT



OFFICIAL USE ONLY | LAW ENFORCEMENT SENSITIVE

07/30/2023 16:03 EDT

Page 10 of 26

Line Item Description	Bulk Ammunition
Caliber	.223
Manufacturer	Various
Serial Number	N/A
Property Legal Status	EN - Evidence - Dual Status (Forfeitable)
Property Physical Status	HE - Held by Customs
Seizure Statistic	
Type	SZ - SEIZURE
Date	March 16, 2023
Status	Approved

Incident Line Item Number	13
Incident Sub-Line Item Number	0000
Quantity	1
Unit of Measure	EA - UNITS
Value	0
Line Item Description	Glock magazine
Caliber	9mm
Serial Number	N/A
Property Legal Status	EN - Evidence - Dual Status (Forfeitable)
Property Physical Status	HE - Held by Customs
Seizure Statistic	
Type	SZ - SEIZURE
Date	March 16, 2023
Status	Approved

Incident Line Item Number	14
----------------------------------	----

Case Number

LX05HS22LX0001

Case Title

Operation Karaoke

EAGLE Event Number

Not Specified

Date Approved

3/16/2023

OFFICIAL USE ONLY | LAW ENFORCEMENT SENSITIVE

This document is loaned to you for official use only and remains the property of the Department of Homeland Security. Any further request for disclosure of this document or information contained herein should be referred to HSI Headquarters together with a copy of the document.



DEPARTMENT OF HOMELAND SECURITY

HOMELAND SECURITY INVESTIGATIONS

INCIDENT REPORT



OFFICIAL USE ONLY | LAW ENFORCEMENT SENSITIVE

07/30/2023 16:03 EDT

Page 11 of 26

Incident Sub-Line Item Number	0000
Line Item Type	
Category	ARM - Arms/Ammo/Explosives
Type	AMM - Ammunition
Quantity	14
Unit of Measure	EA - UNITS
Value	0
Line Item Description	Ammunition from Glock magazine
Caliber	9mm
Serial Number	N/A
Property Legal Status	EN - Evidence - Dual Status (Forfeitable)
Property Physical Status	HE - Held by Customs
Seizure Statistic	
Type	SZ - SEIZURE
Date	March 16, 2023
Status	Approved

Incident Line Item Number	15
Incident Sub-Line Item Number	0000
Line Item Type	
Category	OTH - General MDS/Other
Type	ZZZ - Other
Quantity	1
Unit of Measure	EA - UNITS
Value	0
Line Item Description	Bulk Ammunition container
Property Legal Status	EV - Evidence - Single Status

Case Number

LX05HS22LX0001

Case Title

Operation Karaoke

EAGLE Event Number

Not Specified

Date Approved

3/16/2023

OFFICIAL USE ONLY | LAW ENFORCEMENT SENSITIVE

This document is loaned to you for official use only and remains the property of the Department of Homeland Security. Any further request for disclosure of this document or information contained herein should be referred to HSI Headquarters together with a copy of the document.



DEPARTMENT OF HOMELAND SECURITY

HOMELAND SECURITY INVESTIGATIONS

INCIDENT REPORT



OFFICIAL USE ONLY | LAW ENFORCEMENT SENSITIVE

07/30/2023 16:03 EDT

Page 12 of 26

Property Physical Status	HE - Held by Customs
Seizure Statistic	
Type	SZ - SEIZURE
Date	March 16, 2023
Status	Approved

Incident Line Item Number	16
Incident Sub-Line Item Number	0000
Line Item Type	
Category	ARM - Arms/Ammo/Explosives
Type	AMM - Ammunition
Quantity	244
Unit of Measure	EA - UNITS
Value	0
Line Item Description	Bulk Ammunition
Caliber	.357 magnum
Serial Number	N/A
Property Legal Status	EN - Evidence - Dual Status (Forfeitable)
Property Physical Status	HE - Held by Customs
Seizure Statistic	
Type	SZ - SEIZURE
Date	March 16, 2023
Status	Approved

Incident Line Item Number	17
Incident Sub-Line Item Number	0000
Quantity	1
Unit of Measure	EA - UNITS

Case Number	Case Title	EAGLE Event Number	Date Approved
LX05HS22LX0001	Operation Karaoke	Not Specified	3/16/2023

OFFICIAL USE ONLY | LAW ENFORCEMENT SENSITIVE

This document is loaned to you for official use only and remains the property of the Department of Homeland Security. Any further request for disclosure of this document or information contained herein should be referred to HSI Headquarters together with a copy of the document.



DEPARTMENT OF HOMELAND SECURITY

HOMELAND SECURITY INVESTIGATIONS

INCIDENT REPORT



OFFICIAL USE ONLY | LAW ENFORCEMENT SENSITIVE

07/30/2023 16:03 EDT

Page 13 of 26

Value	0
Line Item Description	Pistol Drum Magazine
Caliber	9mm
Model	50 round drum
Serial Number	N/A
Property Legal Status	EN - Evidence - Dual Status (Forfeitable)
Property Physical Status	HE - Held by Customs
Seizure Statistic	
Type	SZ - SEIZURE
Date	March 16, 2023
Status	Approved

Incident Line Item Number	18
Incident Sub-Line Item Number	0000
Line Item Type	
Category	ARM - Arms/Ammo/Explosives
Type	RFL - Rifle
Quantity	1
Unit of Measure	EA - UNITS
Value	0
Line Item Description	Completed 80% lower receiver AR style pistol
Caliber	556
Manufacturer	None
Serial Number	N/A
Property Legal Status	EN - Evidence - Dual Status (Forfeitable)
Property Physical Status	HE - Held by Customs

Case Number

LX05HS22LX0001

Case Title

Operation Karaoke

EAGLE Event Number

Not Specified

Date Approved

3/16/2023

OFFICIAL USE ONLY | LAW ENFORCEMENT SENSITIVE

This document is loaned to you for official use only and remains the property of the Department of Homeland Security. Any further request for disclosure of this document or information contained herein should be referred to HSI Headquarters together with a copy of the document.



DEPARTMENT OF HOMELAND SECURITY

HOMELAND SECURITY INVESTIGATIONS

INCIDENT REPORT



OFFICIAL USE ONLY | LAW ENFORCEMENT SENSITIVE

07/30/2023 16:03 EDT

Page 14 of 26

Seizure Statistic	
Type	SZ - SEIZURE
Date	March 16, 2023
Status	Approved

Incident Line Item Number	19
Incident Sub-Line Item Number	0000
Quantity	1
Unit of Measure	EA - UNITS
Value	0
Line Item Description	Colt AR style magazine
Serial Number	N/A
Property Legal Status	EN - Evidence - Dual Status (Forfeitable)
Property Physical Status	HE - Held by Customs
Seizure Statistic	
Type	SZ - SEIZURE
Date	March 16, 2023
Status	Approved

Incident Line Item Number	20
Incident Sub-Line Item Number	0000
Line Item Type	
Category	ARM - Arms/Ammo/Explosives
Type	AMM - Ammunition
Quantity	20
Unit of Measure	EA - UNITS
Value	0
Line Item Description	Ammunition from Colt AR style magazine

Case Number

LX05HS22LX0001

Case Title

Operation Karaoke

EAGLE Event Number

Not Specified

Date Approved

3/16/2023

OFFICIAL USE ONLY | LAW ENFORCEMENT SENSITIVE

This document is loaned to you for official use only and remains the property of the Department of Homeland Security. Any further request for disclosure of this document or information contained herein should be referred to HSI Headquarters together with a copy of the document.



DEPARTMENT OF HOMELAND SECURITY

HOMELAND SECURITY INVESTIGATIONS

INCIDENT REPORT



OFFICIAL USE ONLY | LAW ENFORCEMENT SENSITIVE

07/30/2023 16:03 EDT

Page 15 of 26

Caliber	5.56mm
Serial Number	N/A
Property Legal Status	EN - Evidence - Dual Status (Forfeitable)
Property Physical Status	HE - Held by Customs
Seizure Statistic	
Type	SZ - SEIZURE
Date	March 16, 2023
Status	Approved

Incident Line Item Number	21
Incident Sub-Line Item Number	0000
Line Item Type	
Category	ADP - Computer
Type	LAP - Laptop
Value	0
Line Item Description	Alienware Laptop
Model	P109F
Property Legal Status	EV - Evidence - Single Status
Property Physical Status	HE - Held by Customs
Seizure Statistic	
Type	SZ - SEIZURE
Date	March 16, 2023
Status	Approved

Incident Line Item Number	22
Incident Sub-Line Item Number	0000
Line Item Type	
Category	ADP - Computer
Type	MED - Computer Storage Media

Case Number

LX05HS22LX0001

Case Title

Operation Karaoke

EAGLE Event Number

Not Specified

Date Approved

3/16/2023

OFFICIAL USE ONLY | LAW ENFORCEMENT SENSITIVE

This document is loaned to you for official use only and remains the property of the Department of Homeland Security. Any further request for disclosure of this document or information contained herein should be referred to HSI Headquarters together with a copy of the document.



DEPARTMENT OF HOMELAND SECURITY

HOMELAND SECURITY INVESTIGATIONS

INCIDENT REPORT



OFFICIAL USE ONLY | LAW ENFORCEMENT SENSITIVE

07/30/2023 16:03 EDT

Page 16 of 26

Quantity	1
Unit of Measure	EA - UNITS
Value	0
Line Item Description	Team Group 256 GB Micro SD Card, S/N: GKXF014SM05
Serial Number	GKXF014SM05
Property Legal Status	EV - Evidence - Single Status
Property Physical Status	HE - Held by Customs
Seizure Statistic	
Type	SZ - SEIZURE
Date	March 16, 2023
Status	Approved

Incident Line Item Number	23
Incident Sub-Line Item Number	0000
Line Item Type	
Category	OTH - General MDS/Other
Type	ZZZ - Other
Quantity	1
Unit of Measure	EA - UNITS
Value	0
Line Item Description	Black Notebook
Property Legal Status	EV - Evidence - Single Status
Property Physical Status	HE - Held by Customs
Seizure Statistic	
Type	SZ - SEIZURE
Date	March 16, 2023
Status	Approved

Case Number

LX05HS22LX0001

Case Title

Operation Karaoke

EAGLE Event Number

Not Specified

Date Approved

3/16/2023

OFFICIAL USE ONLY | LAW ENFORCEMENT SENSITIVE

This document is loaned to you for official use only and remains the property of the Department of Homeland Security. Any further request for disclosure of this document or information contained herein should be referred to HSI Headquarters together with a copy of the document.



DEPARTMENT OF HOMELAND SECURITY

HOMELAND SECURITY INVESTIGATIONS

INCIDENT REPORT



OFFICIAL USE ONLY | LAW ENFORCEMENT SENSITIVE

07/30/2023 16:03 EDT

Page 17 of 26

Incident Line Item Number	24
Incident Sub-Line Item Number	0000
Line Item Type Category Type	ADP - Computer MED - Computer Storage Media
Value	0
Line Item Description	Silver Cutie Pocket Hard Disk Drive
Model	FHD-254
Property Legal Status	EV - Evidence - Single Status
Property Physical Status	HE - Held by Customs
Seizure Statistic Type Date Status	SZ - SEIZURE March 16, 2023 Approved

Incident Line Item Number	25
Incident Sub-Line Item Number	0000
Line Item Type Category Type	OTH - General MDS/Other ZZZ - Other
Quantity	1
Unit of Measure	EA - UNITS
Value	0
Line Item Description	Black baseball bat
Property Legal Status	EV - Evidence - Single Status
Property Physical Status	HE - Held by Customs

Case Number

LX05HS22LX0001

Case Title

Operation Karaoke

EAGLE Event Number

Not Specified

Date Approved

3/16/2023

OFFICIAL USE ONLY | LAW ENFORCEMENT SENSITIVE

This document is loaned to you for official use only and remains the property of the Department of Homeland Security. Any further request for disclosure of this document or information contained herein should be referred to HSI Headquarters together with a copy of the document.



DEPARTMENT OF HOMELAND SECURITY

HOMELAND SECURITY INVESTIGATIONS

INCIDENT REPORT



OFFICIAL USE ONLY | LAW ENFORCEMENT SENSITIVE

07/30/2023 16:03 EDT

Page 18 of 26

Seizure Statistic	
Type	SZ - SEIZURE
Date	March 16, 2023
Status	Approved

Incident Line Item Number	26
Incident Sub-Line Item Number	0000
Line Item Type	
Category	OTH - General MDS/Other
Type	ZZZ - Other
Quantity	1
Unit of Measure	EA - UNITS
Value	0
Line Item Description	Miscellaneous DMV Documents
Property Legal Status	EV - Evidence - Single Status
Property Physical Status	HE - Held by Customs
Seizure Statistic	
Type	SZ - SEIZURE
Date	March 16, 2023
Status	Approved

Incident Line Item Number	27
Incident Sub-Line Item Number	0000
Line Item Type	
Category	OTH - General MDS/Other
Type	ZZZ - Other
Quantity	2
Unit of Measure	EA - UNITS
Value	0

Case Number

LX05HS22LX0001

Case Title

Operation Karaoke

EAGLE Event Number

Not Specified

Date Approved

3/16/2023

OFFICIAL USE ONLY | LAW ENFORCEMENT SENSITIVE

This document is loaned to you for official use only and remains the property of the Department of Homeland Security. Any further request for disclosure of this document or information contained herein should be referred to HSI Headquarters together with a copy of the document.



DEPARTMENT OF HOMELAND SECURITY

HOMELAND SECURITY INVESTIGATIONS

INCIDENT REPORT



OFFICIAL USE ONLY | LAW ENFORCEMENT SENSITIVE

07/30/2023 16:03 EDT

Page 19 of 26

Line Item Description	Skull masks
Property Legal Status	EV - Evidence - Single Status
Property Physical Status	HE - Held by Customs
Seizure Statistic	
Type	SZ - SEIZURE
Date	March 16, 2023
Status	Approved

Incident Line Item Number	28
Incident Sub-Line Item Number	0000
Line Item Type	
Category	OTH - General MDS/Other
Type	ZZZ - Other
Quantity	1
Unit of Measure	EA - UNITS
Value	0
Line Item Description	Skull mask
Property Legal Status	EV - Evidence - Single Status
Property Physical Status	HE - Held by Customs
Seizure Statistic	
Type	SZ - SEIZURE
Date	March 16, 2023
Status	Approved

Incident Line Item Number	29
Incident Sub-Line Item Number	0000
Line Item Type	
Category	OTH - General MDS/Other
Type	ZZZ - Other

Case Number

LX05HS22LX0001

Case Title

Operation Karaoke

EAGLE Event Number

Not Specified

Date Approved

3/16/2023

OFFICIAL USE ONLY | LAW ENFORCEMENT SENSITIVE

This document is loaned to you for official use only and remains the property of the Department of Homeland Security. Any further request for disclosure of this document or information contained herein should be referred to HSI Headquarters together with a copy of the document.



DEPARTMENT OF HOMELAND SECURITY

HOMELAND SECURITY INVESTIGATIONS

INCIDENT REPORT



OFFICIAL USE ONLY | LAW ENFORCEMENT SENSITIVE

07/30/2023 16:03 EDT

Page 20 of 26

Quantity	2
Unit of Measure	EA - UNITS
Value	0
Line Item Description	State of California Documents
Property Legal Status	EV - Evidence - Single Status
Property Physical Status	HE - Held by Customs
Seizure Statistic	
Type	SZ - SEIZURE
Date	March 16, 2023
Status	Approved

Incident Line Item Number	30
Incident Sub-Line Item Number	0000
Line Item Type	
Category	OTH - General MDS/Other
Type	ZZZ - Other
Quantity	2
Unit of Measure	EA - UNITS
Value	0
Line Item Description	Forest Lawn Documents
Property Legal Status	EV - Evidence - Single Status
Property Physical Status	HE - Held by Customs
Seizure Statistic	
Type	SZ - SEIZURE
Date	March 16, 2023
Status	Approved

Incident Line Item Number	31
----------------------------------	----

Case Number

LX05HS22LX0001

Case Title

Operation Karaoke

EAGLE Event Number

Not Specified

Date Approved

3/16/2023

OFFICIAL USE ONLY | LAW ENFORCEMENT SENSITIVE

This document is loaned to you for official use only and remains the property of the Department of Homeland Security. Any further request for disclosure of this document or information contained herein should be referred to HSI Headquarters together with a copy of the document.



DEPARTMENT OF HOMELAND SECURITY

HOMELAND SECURITY INVESTIGATIONS

INCIDENT REPORT



OFFICIAL USE ONLY | LAW ENFORCEMENT SENSITIVE

07/30/2023 16:03 EDT

Page 21 of 26

Incident Sub-Line Item Number	0000
Line Item Type	
Category	OTH - General MDS/Other
Type	OTD - Other Travel Document
Value	0
Line Item Description	Permanent Resident Card: CHO, Daekun
Property Legal Status	EV - Evidence - Single Status
Property Physical Status	HE - Held by Customs
Seizure Statistic	
Type	SZ - SEIZURE
Date	March 16, 2023
Status	Approved

Incident Line Item Number	32
Incident Sub-Line Item Number	0000
Line Item Type	
Category	OTH - General MDS/Other
Type	OTD - Other Travel Document
Value	0
Line Item Description	Employment Authorization Card: CHO, Daekun
Property Legal Status	EV - Evidence - Single Status
Property Physical Status	HE - Held by Customs
Seizure Statistic	
Type	SZ - SEIZURE
Date	March 16, 2023
Status	Approved

Incident Line Item Number	33
Incident Sub-Line Item Number	0000

Case Number	Case Title	EAGLE Event Number	Date Approved
LX05HS22LX0001	Operation Karaoke	Not Specified	3/16/2023

OFFICIAL USE ONLY | LAW ENFORCEMENT SENSITIVE

This document is loaned to you for official use only and remains the property of the Department of Homeland Security. Any further request for disclosure of this document or information contained herein should be referred to HSI Headquarters together with a copy of the document.



DEPARTMENT OF HOMELAND SECURITY

HOMELAND SECURITY INVESTIGATIONS

INCIDENT REPORT



OFFICIAL USE ONLY | LAW ENFORCEMENT SENSITIVE

07/30/2023 16:03 EDT

Page 22 of 26

Value	0
Line Item Description	Social Security Card: CHO, Daekun
Property Legal Status	EV - Evidence - Single Status
Property Physical Status	HE - Held by Customs
Seizure Statistic	
Type	SZ - SEIZURE
Date	March 16, 2023
Status	Approved

Incident Line Item Number	34
Incident Sub-Line Item Number	0000
Value	0
Line Item Description	Federal Aviation Administration Card: CHO, Daekun
Property Legal Status	EV - Evidence - Single Status
Property Physical Status	HE - Held by Customs
Seizure Statistic	
Type	SZ - SEIZURE
Date	March 16, 2023
Status	Approved

Incident Line Item Number	35
Incident Sub-Line Item Number	0000
Line Item Type	
Category	OTH - General MDS/Other
Type	ZZZ - Other
Value	0
Line Item Description	Pictures with note
Property Legal Status	EV - Evidence - Single Status

Case Number	Case Title	EAGLE Event Number	Date Approved
LX05HS22LX0001	Operation Karaoke	Not Specified	3/16/2023

OFFICIAL USE ONLY | LAW ENFORCEMENT SENSITIVE

This document is loaned to you for official use only and remains the property of the Department of Homeland Security. Any further request for disclosure of this document or information contained herein should be referred to HSI Headquarters together with a copy of the document.



DEPARTMENT OF HOMELAND SECURITY

HOMELAND SECURITY INVESTIGATIONS

INCIDENT REPORT



OFFICIAL USE ONLY | LAW ENFORCEMENT SENSITIVE

07/30/2023 16:03 EDT

Page 23 of 26

Property Physical Status	HE - Held by Customs
Seizure Statistic	
Type	SZ - SEIZURE
Date	March 16, 2023
Status	Approved

Incident Line Item Number	36
Incident Sub-Line Item Number	0000
Value	0
Line Item Description	Korean Travel Documents
Property Legal Status	EV - Evidence - Single Status
Property Physical Status	HE - Held by Customs
Seizure Statistic	
Type	SZ - SEIZURE
Date	March 16, 2023
Status	Approved

Incident Line Item Number	37
Incident Sub-Line Item Number	0000
Line Item Type	
Category	OTH - General MDS/Other
Type	CEL - Mobile Comm Devices
Quantity	1
Unit of Measure	EA - UNITS
Value	0
Line Item Description	Black Motorola Cellphone, IMEI: 357690700441055; with black case
Property Legal Status	EV - Evidence - Single Status
Property Physical Status	HE - Held by Customs

Case Number	Case Title	EAGLE Event Number	Date Approved
LX05HS22LX0001	Operation Karaoke	Not Specified	3/16/2023

OFFICIAL USE ONLY | LAW ENFORCEMENT SENSITIVE

This document is loaned to you for official use only and remains the property of the Department of Homeland Security. Any further request for disclosure of this document or information contained herein should be referred to HSI Headquarters together with a copy of the document.



DEPARTMENT OF HOMELAND SECURITY

HOMELAND SECURITY INVESTIGATIONS

INCIDENT REPORT



OFFICIAL USE ONLY | LAW ENFORCEMENT SENSITIVE

07/30/2023 16:03 EDT

Page 24 of 26

Seizure Statistic	
Type	SZ - SEIZURE
Date	March 16, 2023
Status	Approved

Routing Information

Supervisor	Aaron Nakayama
Automatic Distribution Office	LA - Los Angeles, CA
Automatic Distribution Office	LX - Los Angeles International Airport, CA
Program Code	111 - COMPUTER FORENSICS
Program Code	208 - MONEY LAUNDERING CONTROL ACT, TITLE 18
Program Code	21U - ASSAULTS
Program Code	2BP - BANKSCAN
Program Code	B7U - TECHNICAL SURVEILLANCE
Program Code	SCR - National SCR Program Code
Program Code	SJO - SLOT Joint Ops
Program Code	YL0 - DRUG SMUGGLING
Program Code	YS0 - GANGS
Document Notification Level	1 - TO RECORD OWNER

Restrict Visibility

Groups Visible To	Restricted
--------------------------	------------

Case Number	Case Title	EAGLE Event Number	Date Approved
LX05HS22LX0001	Operation Karaoke	Not Specified	3/16/2023

OFFICIAL USE ONLY | LAW ENFORCEMENT SENSITIVE

This document is loaned to you for official use only and remains the property of the Department of Homeland Security. Any further request for disclosure of this document or information contained herein should be referred to HSI Headquarters together with a copy of the document.



DEPARTMENT OF HOMELAND SECURITY



HOMELAND SECURITY INVESTIGATIONS

INCIDENT REPORT

OFFICIAL USE ONLY | LAW ENFORCEMENT SENSITIVE

07/30/2023 16:03 EDT

Page 25 of 26

Narrative

On March 16, 2023, at approximately 0400 hours, a Federal Search Warrant was executed at 5136 Topanga Canyon Blvd., Woodland Hills, CA 91364. Pursuant to the search warrant, multiple weapons, ammunition, U.S. Currency, miscellaneous documents, and miscellaneous travel documents were seized and transported to HSI Los Angeles International Airport (LAX) for processing.

Case Number

LX05HS22LX0001

Case Title

Operation Karaoke

EAGLE Event Number

Not Specified

Date Approved

3/16/2023

OFFICIAL USE ONLY | LAW ENFORCEMENT SENSITIVE

This document is loaned to you for official use only and remains the property of the Department of Homeland Security. Any further request for disclosure of this document or information contained herein should be referred to HSI Headquarters together with a copy of the document.



DEPARTMENT OF HOMELAND SECURITY

HOMELAND SECURITY INVESTIGATIONS

INCIDENT REPORT

OFFICIAL USE ONLY | LAW ENFORCEMENT SENSITIVE



07/30/2023 16:03 EDT

Page 26 of 26

Metadata

Document Number	LX05HS22LX0001-IN003
Document Status	Approved
Opened	3/16/2023
Last Updated	3/28/2023
Author	Karen Gaspar 1038 - SPECIAL AGENT
Owner(s)	Michael Choi 1038 - SPECIAL AGENT 213 [REDACTED]
Supervisor	Aaron Nakayama 1043 - SUPERVISORY SPECIAL AGENT 805 [REDACTED]
Approved	Aaron Nakayama 1018 - HSI NATIONAL PROGRAM MANAGER Supervisor Approval 3/16/2023

Case Metadata

Case Title	Operation Karaoke
Case Number	LX05HS22LX0001
Case Opened	3/19/2022
Case Last Updated	4/26/2023
Approved	Aaron Nakayama 1018 - HSI NATIONAL PROGRAM MANAGER 3/19/2022

Case Number	Case Title	EAGLE Event Number	Date Approved
LX05HS22LX0001	Operation Karaoke	Not Specified	3/16/2023

OFFICIAL USE ONLY | LAW ENFORCEMENT SENSITIVE

This document is loaned to you for official use only and remains the property of the Department of Homeland Security. Any further request for disclosure of this document or information contained herein should be referred to HSI Headquarters together with a copy of the document.

EXHIBIT 18

DOCUMENT UNDER SEAL

EXHIBIT 19

DOCUMENT UNDER SEAL

EXHIBIT 20

DOCUMENT UNDER SEAL

EXHIBIT 21

DOCUMENT UNDER SEAL

EXHIBIT 22

CRIMINAL HISTORY TRANSCRIPT FOR OFFICE USE ONLY - UNAUTHORIZED USE IS A CRIMINAL OFFENSE

INFORMATION FINGERPRINT VERIFIED UNLESS OTHERWISE NOTED BY AN ASTERISK(*)

Do not use for employment, licensing, or certification purposes. CCHRS information must be confirmed and/or verified with the originating agency prior to taking any law enforcement action.

Key Name:(1) CHO, DAEKUN

Date Name First Used: 12/08/2010

SID/CII: [REDACTED]

MAIN: [REDACTED]

FBI: [REDACTED]

ARN: [REDACTED]

Requested By: W53900
WALKER, TOSHI

ACHS Data Included: YES

Agency: CAINSLASO
(HSI) HOMELAND
SECURITY
INVESTIGATIONS (ICE)

Multi-Source Record: NO

Reason: INVESTIGATION

Search Criteria: Search Type:Other ID;
Specific Record:DLRecord
ID: [REDACTED]



DEPT. OF JUSTICE AND DMV MAY HAVE ADDITIONAL INFORMATION

SUMMARY

<u>Bookings</u>	<u>Convictions</u>	<u>Juvenile</u>	<u>Warrants</u>	<u>Probations</u>	<u>ICE</u>
Felony: 5	Felony: 0	Sustained: 0	Bench: 1	Open: 0	Deport: 0
Misd: 0	Misd: 0	Dismissed: 0	Arrest: 3	Expired: 0	Removal: 0
			Infra.(FTA) 0		Illegal Entry: 0

LATEST INFORMATION

Latest Name: CHO, DAEKUN

Date Name Last Used: 05/18/2021

<u>Sex</u>	<u>Race</u>	<u>Hair</u>	<u>Eyes</u>	<u>Hgt</u>	<u>Wgt</u>	<u>DOB</u>	<u>Updated</u>
Male	OTHER	BLACK	BROWN	600	180	[REDACTED]/1984	12/12/2020

Latest Address: [REDACTED] LOS ANGELES CA 90019 05/18/2021

<u>Type</u>	<u>Start Date</u>	<u>End Date</u>	<u>Charge/Description</u>	<u>Case Number</u>	<u>Updated</u>
-------------	-------------------	-----------------	---------------------------	--------------------	----------------

<u>Registration</u>	<u>Reg Number</u>	<u>Location</u>	<u>Reg Date</u>
DNA/DOTS COLLECTED	31677070		12/09/2010
DNA TYPED & UPLOADED	A31677070DNA		01/01/0001
PALM PRINT ON FILE	A31677070PLM		01/01/0001

CRIMINAL HISTORY TRANSCRIPT FOR OFFICE USE ONLY - UNAUTHORIZED USE IS A CRIMINAL OFFENSE
INFORMATION FINGERPRINT VERIFIED UNLESS OTHERWISE NOTED BY AN ASTERISK(*)

Do not use for employment, licensing, or certification purposes. CCHRS information must be confirmed and/or verified with the originating agency prior to taking any law enforcement action.

Key Name:(1) CHO, DAEKUN

Date Name First Used: 12/08/2010

SID/CII: [REDACTED]

MAIN: [REDACTED]

FBI: [REDACTED]

ARN: [REDACTED]

DESCRIPTORS

#/Names/AKAs/Count

(1) CHO, DAEKUN	9	(2) CHO, DAE KUN	1
(3) CHO, DAE KUN	2		

Dates of Birth/Count

[REDACTED]/1984 6

Scars/Marks/Tattoos

TAT L ARM

Other Identifiers

DL [REDACTED] CA

AR [REDACTED]

FBI [REDACTED]

SSN [REDACTED]

Address/Count

Birth Place/Count

XXXSEOUL	1	CALA	1	KO	1	XKOXSOUTHK
XKOSEOUL	1					

Moniker/Count

Gang Membership/Count

JUVENILE SUSTAINED PETITIONS

No Juvenile Information

CRIMINAL HISTORY TRANSCRIPT FOR OFFICE USE ONLY - UNAUTHORIZED USE IS A CRIMINAL OFFENSE
INFORMATION FINGERPRINT VERIFIED UNLESS OTHERWISE NOTED BY AN ASTERISK(*)

Do not use for employment, licensing, or certification purposes. CCHRS information must be confirmed and/or verified with the originating agency prior to taking any law enforcement action.

Key Name:(1) CHO, DAEKUN

Date Name First Used: 12/08/2010

SID/CII: MAIN: FBI: ARN:

CONVICTIONS/ACTIVE DIVERSIONS

<u>Arr Date</u>	<u>Name</u>	<u>Arresting Agency</u>	<u>Booking Number</u>	
12/12/2020	1	LAPD - OLYMPIC	006068311	
	<u>Sex</u>	<u>Race</u>	<u>Hair</u>	
	M	OTHER	BLACK	
		<u>Eyes</u>	<u>Height</u>	
		BROWN	600	
		<u>Weight</u>	<u>DOB</u>	
		180	██████/1984	
<u>Cnt</u>	<u>Arrest Charges</u>	<u>Dispo Date</u>	<u>Result</u>	
1	PC 25850(A) CARRY LOADED FIREARM	03/29/2021	Referred to C.A. for Misdemeanor Cons WARRANT # LAC9999999999	
<u>File Date</u>	<u>Name</u>	<u>CaseNumber/County</u>	<u>Last Dept/Div</u>	<u>Warrants Issued</u>
05/18/2021	1	LAC1CJ0511401/LOS ANGELES	52	2
<u>Cnt</u>	<u>Filed Charges</u>	<u>Dispo Date</u>	<u>Dispo</u>	<u>Sentence/Probation Type</u>
01	PC 25850(A) CARRYING LOADED FIREARM	11/17/2021	Diversion	DIVERSN 18 MONTH(S)
02	PC 27545 FIREARM SALES/ETC VIOL	11/17/2021	Diversion	DIVERSN 18 MONTH(S)
03	PC 664/135 ATTEMPT DESTROY EVIDENCE	11/17/2021	Diversion	DIVERSN 18 MONTH(S)
04	PC 25850(A) CARRYING LOADED FIREARM	11/17/2021	Diversion	DIVERSN 18 MONTH(S)

CRIMINAL HISTORY TRANSCRIPT FOR OFFICE USE ONLY - UNAUTHORIZED USE IS A CRIMINAL OFFENSE
INFORMATION FINGERPRINT VERIFIED UNLESS OTHERWISE NOTED BY AN ASTERISK(*)

Do not use for employment, licensing, or certification purposes. CCHRS information must be confirmed and/or verified with the originating agency prior to taking any law enforcement action.

Key Name:(1) CHO, DAEKUN

Date Name First Used: 12/08/2010

SID/CII: MAIN: FBI: ARN:

PENDING CASES

<u>Arr Date</u>	<u>Name</u>	<u>Arresting Agency</u>	<u>Booking Number</u>
12/22/2010	1	LAPD - OLYMPIC	002585385

<u>Sex</u>	<u>Race</u>	<u>Hair</u>	<u>Eyes</u>	<u>Height</u>	<u>Weight</u>	<u>DOB</u>
M	OTHER	BLACK	BROWN	600	185	/1984

<u>Cnt</u>	<u>Arrest Charges</u>	<u>Dispo Date</u>	<u>Result</u>
1	HS 11352(A) TRANS/SELL/ETC CONT SUBS	UNKNOWN	UNKNOWN

<u>File Date</u>	<u>Name</u>	<u>CaseNumber/County</u>	<u>Last Dept/Div</u>	<u>Warrants Issued</u>
05/16/2011	1	XCNBA37937801/LOS ANGELES	127	NONE

<u>Cnt</u>	<u>Filed Charges</u>	<u>Dispo Date</u>	<u>Dispo</u>	<u>Sentence/Probation Type</u>
01	HS 11350(A) POSSESS NARC CONT SUBS	12/06/2011	Case Consolidated	

<u>Arr Date</u>	<u>Name</u>	<u>Arresting Agency</u>	<u>Booking Number</u>
12/08/2010	1	LAPD - OLYMPIC	002571717

<u>Sex</u>	<u>Race</u>	<u>Hair</u>	<u>Eyes</u>	<u>Height</u>	<u>Weight</u>	<u>DOB</u>
M	OTHER	BLACK	BROWN	601	180	/1984

<u>Cnt</u>	<u>Arrest Charges</u>	<u>Dispo Date</u>	<u>Result</u>
1	HS 11352(A) TRANS/SELL/ETC CONT SUBS	UNKNOWN	UNKNOWN

<u>File Date</u>	<u>Name</u>	<u>CaseNumber/County</u>	<u>Last Dept/Div</u>	<u>Warrants Issued</u>
05/16/2011	1	XCNBA37897301/LOS ANGELES	CLK	1

CRIMINAL HISTORY TRANSCRIPT FOR OFFICE USE ONLY - UNAUTHORIZED USE IS A CRIMINAL OFFENSE
INFORMATION FINGERPRINT VERIFIED UNLESS OTHERWISE NOTED BY AN ASTERISK(*)

Do not use for employment, licensing, or certification purposes. CCHRS information must be confirmed and/or verified with the originating agency prior to taking any law enforcement action.

Key Name:(1) CHO, DAEKUN

Date Name First Used: 12/08/2010

SID/CII: MAIN: FBI: ARN:

<u>Cnt</u>	<u>Filed Charges</u>	<u>Dispo Date</u>	<u>Dispo</u>	<u>Sentence/Probation Type</u>
01	HS 11352(A) TRANS/SELL/ETC CONT SUBS	12/13/2011	Dismissal in furth of justice per 1385 PC	
02	HS 11351 POSS CONT SUBS FOR SALE	12/13/2011	Dismissal in furth of justice per 1385 PC	
03	HS 11352(A) TRANS/SELL/ETC CONT SUBS	12/13/2011	Dismissal in furth of justice per 1385 PC	
04	HS 11351 POSS CONT SUBS FOR SALE	12/13/2011	Dismissal in furth of justice per 1385 PC	
05	HS 11379(A) CONT SUBS - TRANSP/SELL	12/13/2011	Dismissal in furth of justice per 1385 PC	
06	HS 11378 CONT SUBS - POSS FOR SALE	12/13/2011	Dismissal in furth of justice per 1385 PC	
07	HS 11360(A) TRANSPORT/SELL MARIJUANA	12/13/2011	Dismissal in furth of justice per 1385 PC	
08	HS 11359 POSS MARIJUANA FOR SALE	12/13/2011	Dismissal in furth of justice per 1385 PC	
09	HS 11350(A) POSSESS NARC CONT SUBS	03/21/2013 04/29/2019	Deferred Judgement Reinstated & Terminated	DIVERSN 18 MONTH(S) DIVERSN 18 MONTH(S)

CRIMINAL HISTORY TRANSCRIPT FOR OFFICE USE ONLY - UNAUTHORIZED USE IS A CRIMINAL OFFENSE
INFORMATION FINGERPRINT VERIFIED UNLESS OTHERWISE NOTED BY AN ASTERISK(*)

Do not use for employment, licensing, or certification purposes. CCHRS information must be confirmed and/or verified with the originating agency prior to taking any law enforcement action.

Key Name:(1) CHO, DAEKUN

Date Name First Used: 12/08/2010

SID/CII: MAIN: FBI: ARN:

ARRESTS/CASES NOT REPORTED ABOVE

Arr Date	Name	Arresting Agency	Booking Number				
	Sex	Race	Hair	Eyes	Height	Weight	DOB
	M	OTHER	BLACK	BROWN	601	185	/1984

File Date	Name	CaseNumber/County	Last Dept/Div	Warrants Issued
02/10/2016	2	XCNBA43835301/LOS ANGELES	BND	1

Cnt	Filed Charges	Dispo Date	Dispo	Sentence/Probation Type
01	PC 245(A)(2)	06/09/2016	Delay - Action not brought to court in time	
ADW - W/FIREARM				

Arr Date	Name	Arresting Agency	Booking Number				
12/03/2015	3	LAPD - OLYMPIC	004515625				
	Sex	Race	Hair	Eyes	Height	Weight	DOB
	M	OTHER	BLACK	BROWN	601	180	/1984

Cnt	Arrest Charges	Dispo Date	Result
1	PC 245(A)(1) ADW - NOT FIREARM	UNKNOWN	UNKNOWN
WARRANT # BA43835301			

(CASE FILING INFORMATION NOT MATCHED IN L.A. COUNTY)

Arr Date	Name	Arresting Agency	Booking Number				
02/23/2013	1	LAPD - WILSHIRE AREA	003471522				
	Sex	Race	Hair	Eyes	Height	Weight	DOB
	M	CHINESE	BLACK	BROWN	600	180	/1984

Cnt	Arrest Charges	Dispo Date	Result
1	LAMC	UNKNOWN	UNKNOWN
2	HS 11350(A) POSSESS NARC CONT SUBS	UNKNOWN	UNKNOWN
WARRANT # BA37897301			

File Date	Name	CaseNumber/County	Last Dept/Div	Warrants Issued
03/11/2013	1	LAA3CA0068901/LOS ANGELES		NONE

CRIMINAL HISTORY TRANSCRIPT FOR OFFICE USE ONLY - UNAUTHORIZED USE IS A CRIMINAL OFFENSE
INFORMATION FINGERPRINT VERIFIED UNLESS OTHERWISE NOTED BY AN ASTERISK(*)

Do not use for employment, licensing, or certification purposes. CCHRS information must be confirmed and/or verified with the originating agency prior to taking any law enforcement action.

Key Name: (1) CHO, DAEKUN		Date Name First Used: 12/08/2010	
SID/CII: [REDACTED]	MAIN: [REDACTED]	FBI: [REDACTED]	ARN: [REDACTED]

<u>Cnt</u>	<u>Filed Charges</u>	<u>Dispo Date</u>	<u>Dispo</u>	<u>Sentence/Probation Type</u>
02		03/20/2013	Dismissed Due to Plea Negotiation	
	LA71.03(D)			

END OF TRANSCRIPT

EXHIBIT 23

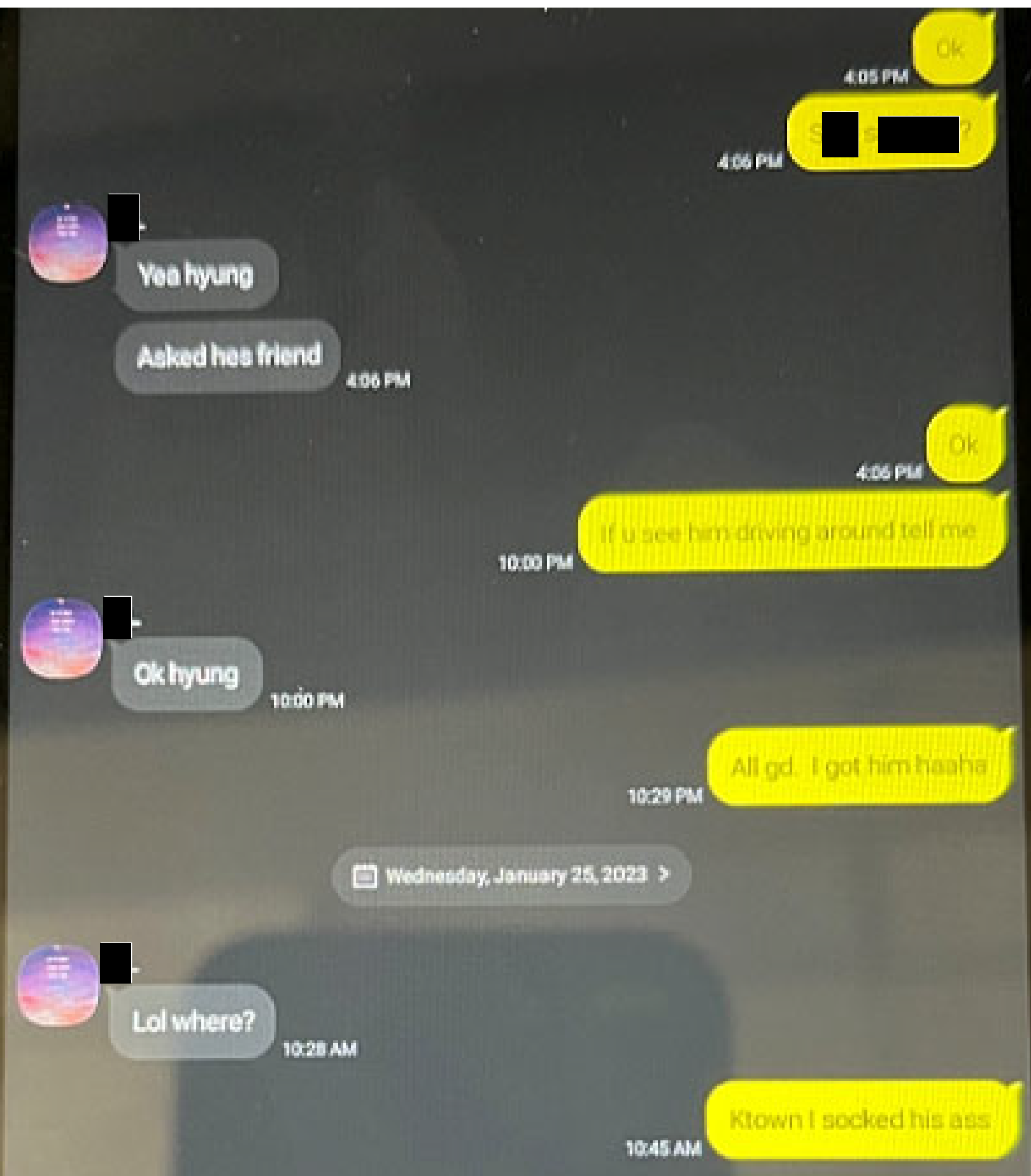


EXHIBIT 24

4:25



Oh ok

12:08 PM

Saturday, January 14, 2023 >

Wattsup

Venmo forr jan

9:11 PM



Got you senior

9:13 PM

Sunday, January 15, 2023 >

?

4:10 AM

Tuesday, January 24, 2023 >

Yoyo

3:10 PM



Wussup hyung

4:30 PM

U kno where s lives

5:07 PM



No. :/

5:13 PM

Wednesday, January 25, 2023 >

I found him and socked him

12:36 AM



Lol damn. What happened.

12:37 AM

We have rules

